

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
2018 Quadrennial Regulatory Review –)	MB Docket No. 18-349
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	

COMMENTS OF CONNOISSEUR MEDIA, LLC

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April 29, 2019

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COMMENTS OF CONNOISSEUR MEDIA, LLC

Connoisseur Media, LLC (“Connoisseur”) hereby submits its comments in response to the 2018 Quadrennial Regulatory Review *Notice of Proposed Rulemaking* (“*NPRM*”) adopted by the Commission in the above-referenced proceeding.¹

INTRODUCTION AND SUMMARY

In the *NPRM*, the Federal Communications Commission (the “Commission”) seeks comment on the Local Radio Ownership Rule (“ownership rule”) and how the ownership rule should apply to Nielsen Audio Metro markets that are embedded within larger Nielsen Audio Metro markets. As detailed further below, Connoisseur believes that the Commission’s policy of reviewing acquisitions of stations that are home to an embedded market to be part of both the embedded market and the larger “parent market” for ownership purposes does not reflect true marketplace conditions. The local stations home to embedded markets compete in those embedded markets, and not in other embedded markets in the same parent market, nor within the core of the parent market. Thus, those embedded market stations are like stations in any other

¹ 2018 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Notice of Proposed Rulemaking, MB Docket No. 18-349, FCC 18-179 (rel. Dec. 13, 2018) (“*NPRM*”). Connoisseur is also filing, with other parties, comments on the broader issues raised in the *NPRM*. However, as it was the principal advocate for changes in the policies governing the application of the local radio ownership rules to embedded markets in prior Quadrennial Reviews, it is separately filing these comments.

Nielsen Audio Metro market – the embedded market where each station is located should be viewed on a standalone basis when assessing ownership compliance; ownership in adjacent markets should not be considered.

The presumptive waiver standard adopted by the Commission in the 2014 Quadrennial Regulatory Review *Order on Reconsideration* established that a radio station owner may own as many stations as allowed under the numerical ownership limit in each embedded market using the Nielsen Audio Metro methodology.² This presumptive waiver standard aimed to accommodate the stations within embedded markets in parent markets where multiple embedded markets exist. Connoisseur believes that the Commission’s policy to count embedded market stations in both the embedded market and in the parent market should be abolished, as that policy does not comport with the true nature of these markets. However, Connoisseur is content if the presumptive waiver adopted in the *Order on Reconsideration* is made permanent and applied in the future, both in existing markets where there are multiple embedded markets and should new markets emerge where there are multiple embedded markets.

DISCUSSION

I. The Commission Should Either Change Its Policy on Embedded Market Stations or Permanently Adopt the Presumptive Waiver Standard.

In the *NPRM*, the Commission seeks comment on whether it should change its policy as to its consideration of stations home to embedded markets or whether it should make permanent its presumptive waiver standard.³ As stated above, Connoisseur believes that the policy should be eliminated but, if the Commission is unwilling to do so, it should make the presumptive

² 2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Order on Reconsideration and Notice of Proposed Rulemaking, 32 FCC Rcd 9802 (2017) (“*Order on Reconsideration*”); see also *NPRM* ¶ 34.

³ *NPRM* ¶ 35.

waiver standard permanent. In the last Quadrennial Review, Connoisseur provided ample evidence to demonstrate that the current underlying policy, before being amended by the presumptive waiver standard, does not reflect the realities of the marketplace. The Commission should rely on that evidence here to make the changes necessary.

In the *NPRM*, the Commission cites its underlying basis for, up to this point, refusing to eliminate its policy of assessing ownership limits in both the embedded market and core of the parent market when evaluating an acquisition of a station in an embedded market. That reasoning is based on the Commission's belief that the inclusion by Nielsen Audio of stations licensed to communities in embedded markets means Nielsen Audio views these stations as competitors in both the embedded market and the greater parent market. That determination is summarized in the *NPRM* as follows:

Citing its longstanding reliance on the market analysis of Nielsen Audio (formerly Arbitron), the Commission initially declined to adopt Connoisseur's proposal but stated that it would entertain market-specific waiver requests under Section 1.3 when the BIA listings in a parent market are not an accurate reflection of competition by embedded market stations. On reconsideration, the Commission affirmed its earlier decision not to adopt an across-the-board change to its embedded market methodology.⁴

In October 30, 2017 *Supplemental Comments* filed in the prior Quadrennial Review, Connoisseur explained why the Commission's understanding of the nature of embedded market stations is mistaken.⁵ In that filing, Connoisseur included statements from both Nielsen Audio and BIA making clear the meaning of listing an embedded market station as a station in the

⁴ *Id.* ¶ 34 (citations omitted).

⁵ Letter and from David Oxenford, Counsel for Connoisseur Media, LLC, to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 & 14-50 (filed Oct. 30, 2017) ("October 2017 Supplemental Comments"). The October 2017 Supplemental Comments are attached hereto as Exhibit A.

parent market.⁶ While the Commission remedied that misunderstanding by adopting the presumptive waiver in the *Order on Reconsideration*, the Commission should now make the remedial change permanent. As set forth in each of the statements Connoisseur submitted from Nielsen and BIA, the inclusion of an embedded market station as being a station in the parent market *is not based on a determination that the station competes in the parent market*, but is instead simply a statement of geography. Nielsen has a policy of including any station licensed to a community located within the geographic boundaries of the political subdivisions within a market as being in that market. As the geographical limits of the parent market by definition encompass the area within the embedded markets, and the embedded market stations are licensed to communities in those areas, they are included in the listing of stations in the parent market. In light of the statements provided by both Nielsen and BIA, any assumption that the inclusion of embedded market stations in the parent market connotes some competition by those stations in that parent market is simply wrong.⁷

Both the Nielsen and BIA statements make clear that the very reason that embedded markets exist is that the stations in these markets *do not compete in the parent market*, but instead compete locally within the embedded market. The establishment of an embedded market, as with the creation of any other Nielsen market, is Nielsen's recognition of an area

⁶ In the interest of time, when it filed the October 2017 Supplemental Comments, Nielsen asked Connoisseur to summarize its understandings of the issues at hand here, and Connoisseur's understandings of the meaning of the Nielsen Audio designations. Nielsen Audio's responsive letter states: "We confirm each of the understandings described in your letter with two clarifications." Letter from Bill Rose, Senior Vice President, Local Media Product Leadership, Nielsen, to Jeffrey Warshaw, CEO, Connoisseur Media, LLC (dated Oct. 30, 2017). Neither clarification is relevant to the discussion here. The October 2017 Supplemental Comments and exhibits, including Nielsen's response, are attached hereto as Exhibit A.

⁷ *E.g.*, October 2017 Supplemental Comments at Exhibit 1, Declaration of Mark R. Fratrik at ¶ 9 ("That listing of an embedded station in the parent market report does not reflect a determination by Nielsen Audio nor BIA/Kelsey that, absent other information, the station competes in that parent market. It just reflects that their city of license is geographically located within the boundaries of the parent market. It is a reflection of geography, not an analysis of competition.").

where a set of stations primarily compete. If these embedded market stations all competed in the parent market, there would be no need for embedded markets at all. Instead, if all of the embedded markets stations competed in the parent market, they would simply be listed as stations in the parent market. The existence of the embedded market shows that each of these embedded markets is a unique area, like any other Nielsen market, where the stations home to that market compete.⁸

In the last Quadrennial Review, Connoisseur provided substantial unrefuted and unchallenged evidence that the only reason “embedded” markets have this special characterization is because the stations home to the core of the parent market look at these outlying areas as part of their market for listeners – and part of the area stations can tell advertisers that they serve.⁹ It is because the parent market stations compete in the areas encompassed by the embedded markets that the special term “embedded” is applied, not because the local stations home to the embedded markets compete in the parent market. Both the BIA and Nielsen statements confirm the truth of this argument.

BIA’s statement sets forth that it lists what it considers to be the “home” market of each station that it considers to be part of that market in its list of Commission Geographic Markets. In the Geographic Market reports for New York and Washington, D.C., included as part of Exhibit A, all of the embedded market stations are listed as being “home” to the embedded market, not to the parent market. Further, when BIA provides market revenue data, it considers revenues for the embedded market stations to be allocable only to the embedded market, not to the parent market. The revenues listed for the parent market stations do not include the revenues

⁸ *E.g., id.* at ¶¶ 12-13.

⁹ *See, e.g.,* Petition of Connoisseur Media, LLC for Reconsideration, MB Docket Nos.14-50 & 09-182, at 4-6 (filed Dec. 1, 2016) (“Petition for Reconsideration”).

of the embedded market stations, again demonstrating that BIA does not consider them to be competitors in that market that add to the revenue of the parent market.

Given the statements of BIA and Nielsen, there is no reason for there to be any dual-evaluation of embedded market acquisitions where the proposed assignee does not hold any station licenses home to the core parent market. There is no evidence to make any other decision. The Commission's policy to evaluate acquisitions in both markets was based on the misconception that Nielsen's and BIA's designation of an embedded market station as being "above-the-line" in the parent market constitutes a determination that these stations compete in the parent,¹⁰ a misconception that has now been clarified by the statements of the two companies to which the Commission looks in determining which stations are in what markets.

For the sake of completeness of the record, Connoisseur will also point out several other statements in the *NPRM* that lack any basis in the record. First, the *NPRM*'s conclusion that embedded market stations compete in the parent market is not supported by the record.

Connoisseur has provided convincing evidence that the embedded market stations do not in fact compete in the parent market. It has shown that, even if one party were to own every embedded market station in the every embedded market in the New York City parent market, which is impossible as that ownership would far exceed the ownership limits in each of the embedded markets,¹¹ it would have approximately half the market share of the two largest owners in the

¹⁰ *Order on Reconsideration*, 32 FCC Rcd at 9841-42 ¶¶ 87-89.

¹¹ For instance, as shown in Exhibit B attached hereto, in the Nassau/Suffolk embedded market, there are 46 stations that BIA lists as being home to the market, meaning that, as one party can only own 8 stations in a market of that size, there are at least 38 stations that one party could not own.

parent market.¹² In the Washington, D.C. parent market, that ownership would rank the owner of every embedded market station as, at best, a weak sixth in the market.¹³

The facts that Connoisseur provided to the Commission in the prior Quadrennial Review, which were never analyzed or refuted, support the statements by Nielsen and BIA. Connoisseur provided a county-by-county breakdown of the listening of the embedded market stations, showing that virtually all of the listening to those stations comes from listeners in the home counties of the embedded market, not from listeners in the parent market or in other embedded markets.¹⁴ These listening patterns are not the result of listener choice, but because of geography. Connoisseur showed that the embedded market station with the greatest 1 mv/m coverage of the greater New York City parent market has just over 50 percent coverage of that market, while the vast majority of the other embedded market stations fall below 50 percent market coverage – most substantially below. By contrast, the parent market station with the least coverage covers 80 percent of the parent market, with most parent market stations having 80 percent coverage.¹⁵ A station cannot serve an area in which it does not have a signal. Given the spectrum congestion in markets of New York City and Washington, D.C. where there are multiple embedded markets, it is unlikely that these coverage areas could be changed.¹⁶

¹² Petition for Reconsideration at 6 (citing Letter from David Oxenford, Counsel to Connoisseur Media, LLC, to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 & 14-50, at Ex. 1 (filed June 7, 2016) (“Connoisseur June 7 Letter”)).

¹³ See Letter from David Oxenford, Counsel to Connoisseur Media, LLC, to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 & 14-50, at E-5 (filed June 6, 2017) (“Connoisseur June 6 Letter”).

¹⁴ Petition for Reconsideration at 5 n.7 (citing Connoisseur June 7 Letter (analyzing New York parent market)); see also Connoisseur June 6 Letter at E6-E7 (analyzing Washington, D.C. parent market).

¹⁵ Petition for Reconsideration at 7 (citing Connoisseur June 7 Letter at Ex. 2).

¹⁶ If suburban stations could have moved their transmitter sites to allow greater coverage of New York, the largest market in the country, it would be irrational to believe that this kind of coverage improvement would not have already been made.

In all relevant respects to the analysis here, these embedded markets are remarkably similar. Connoisseur has shown that in all embedded markets, both in the New York City and Washington, D.C. parent markets, there is remarkably little commuting by residents of one embedded market to another (though all have substantial commuting to the center city).¹⁷ As set forth in the prior paragraph, the signal strength of the stations in each embedded market is insufficient to reach the majority of the parent market. And there is very little or no listening by residents of one embedded market to stations from another embedded market (though, again, there is significant listening in each embedded market to the stations from the central city).¹⁸

These embedded markets really are just like any other Nielsen Audio market and should be treated as such for local ownership purposes. There are many other adjacent Nielsen markets where cross-market listening far exceeds the level of such listening by residents of one embedded market to stations from other embedded markets. Yet in those other markets, one owner can own up to the maximum number of stations in each adjacent market with no Commission scrutiny.¹⁹ Denying that same treatment to licensees in embedded markets, simply because Nielsen has called them “embedded,” with no other policy reason justifying such treatment, is arbitrary, particularly in light of the explanations of the meaning of an “embedded market” that has now been provided to the Commission by Nielsen and BIA.

Connoisseur is not asking for any action that would upset the Commission’s reliance on Nielsen Audio, as interpreted by BIA, as the basis of its local radio ownership analysis. Instead, it is simply asking for that same treatment to be applied to the owners of stations located

¹⁷ Petition for Reconsideration at 7-8 (citing Comments of Connoisseur Media, LLC, MB Docket Nos. 14-50 & 09-182, at 5-7 (filed Aug. 6, 2014) (“Initial Comments”)); Connoisseur June 6 Letter at E-2.

¹⁸ Petition for Reconsideration at 7-8 (citing Initial Comments at 5-7); Connoisseur June 6 Letter at E-3.

¹⁹ Letter from David Oxenford, Counsel for Connoisseur Media, LLC, to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 & 14-50 (filed Oct. 17, 2017).

exclusively in the embedded markets, as those markets really are just like any other – but for the fact that their economic environment is so much harder to operate a business in, as so much of the revenue is taken by the parent market stations. Embedded market stations need to be able to recognize the economies and synergies that can be realized by owning stations in geographically proximate markets as the stations home to the core parent market take so much revenue out of these markets. There is simply no reason to continue to require the dual-market analysis for acquisitions of stations that lie solely within embedded markets.²⁰

II. There is No Risk for Gamesmanship by Adopting the Presumptive Waiver Standard or Alternative Proposal.

Permanently adopting the presumptive waiver standard or alternative proposal does not encourage any new gamesmanship. The Commission currently relies on BIA to assess which stations are located within certain markets. If a central city station attempted to move to an embedded market, while continuing to serve the central city or parent market, BIA would continue to recognize it as a central city station. For example, BIA currently recognizes WKTU as a New York City station, even though it is licensed to a Long Island community, since it has a transmitter on the Empire State Building and services the entire metropolitan area. For all other purposes in assessing the radio ownership rules, the Commission has entrusted BIA to make the

²⁰ Connoisseur recognizes that the proposal submitted by the National Association of Broadcasting (“NAB”) also provides a way of avoiding the current policy regarding embedded market stations. NAB proposed that, in lieu of a waiver, any stations licensed in embedded markets with city-grade signal coverage of less than 50 percent of the parent market’s population not be considered part of the parent market for purposes of local ownership limit calculations. If the Commission declines to abolish the dual consideration entirely or to make permanent the Connoisseur presumption, NAB’s proposal is an alternative effective mechanism for relieving some of the pressures put on stations located in embedded markets.

call as to the market in which a station is located.²¹ There is no reason to depart from that reliance only in the case of embedded markets.

Furthermore, it would not make sense for a station currently located in a core market to move its designation as to its “home” to an embedded market to try to game Commission rules. Doing so would cost it significant revenue and greatly diminish the value of the station. Advertisers allocate their advertising dollars based on a station’s home market designation. Advertising dollars in core markets, like Washington, D.C. or New York City, far exceed the advertising dollars available in embedded markets.²² No station home to the core of the parent market would surrender that designation and risk the loss of those advertising dollars.

The nature of the advertising market is also clear from Connoisseur’s previous evidence provided to the Commission demonstrating that central city stations serve the embedded market areas and syphon the majority of advertising dollars away from these embedded markets.²³ That is because advertisers recognize that these central-city stations cover the whole market. Again, no central city station would forego these revenues to try to game the ownership rules. For these reasons, the Commission has no justified concerns that abolishing the dual-market consideration of embedded market stations or permanently adopting the waiver standard will result in a less competitive environment or any gamesmanship.

²¹ *2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Second Report and Order, 31 FCC Rcd 9864, 9903-04 ¶¶ 102-103 (2016).

²² See Connoisseur June 6 Letter at E-8-E-9.

²³ Petition for Reconsideration at 8-9 (explaining how central city stations are able to sell significant advertising to businesses located in the embedded markets, and how radio revenues in embedded markets are only a fraction of the revenues of other similarly situated markets around the country).

III. The Commission Should Make Clear That the Presumption Will Apply to Future Multiple Embedded Markets.

As demonstrated above, the only reason that embedded markets exist is to show that there are clusters of suburban area stations that compete for local revenues among themselves – and not with the central city stations. Thus, the Commission should make clear that if similar situations with multiple embedded markets arise in the future, the same analysis described above should apply. There is no need for the Commission to reevaluate each market area when a new situation arises. Embedded markets should be evaluated just like any other market, where stations only count in their own market in any ownership analysis.

As evidence of the above, the only other location where this multiple embedded market existed in the recent past aside from Washington, D.C. and New York City was San Francisco, where at one point San Jose and Santa Rosa were embedded markets. In San Francisco, the presumption worked in the same way as it does today for Washington, D.C. and New York City. Given Nielsen and BIA's description of why there are embedded markets, there is no reason to think that these markets will evolve differently if they arise in the future.

Finally, the Commission should refrain from adopting a waiting period for the presumption to be effective. Almost certainly, the creation of a new embedded market will be the result of a suburban station's determination that it would like to seek Nielsen ratings for that potential new embedded market to assist it in garnering advertising dollars in that local market. BIA can act as an arbiter of where the stations in any embedded market compete, so any new embedded market should be treated the same as other adjacent markets in the U.S. in any multiple ownership analysis.

CONCLUSION

For the foregoing reasons, in its review of the local radio ownership rule, the Commission should either rescind its policy that embedded market stations need to be evaluated both in the parent market and in the embedded market, or permanently adopt its presumptive waiver standard for any metropolitan areas with multiple embedded markets today or in the future. If all interests in such a metropolitan area – including only Washington, D.C. or New York City today – are in embedded markets, ownership should be evaluated solely by review of the ownership limits applicable to the embedded markets. Given the evidence that the Commission has been provided, there is no justification for adopting any other policy with respect to ownership interests in these markets.

Respectfully submitted,

Connoisseur Media, LLC

/s/ David Oxenford

David D. Oxenford
Danielle K. Thumann

Its Attorneys

April 29, 2019

Exhibit A

Ex Parte Letter and Supplemental Comments filed by Connoisseur Media on October 30, 2017
including Exhibits 1, 2, and 3

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October 30, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**Re: Notice of Ex Parte Communications and Supplemental Comments on Draft
Ownership Order and Review of the Local Radio Ownership Rules Dealing
with Embedded Radio Markets
MB Docket Nos. 09-182 and 14-50**

Dear Ms. Dortch:

Connoisseur Media LLC, by the undersigned attorney, files these comments on the draft decision on the “embedded market” issue contained in the FCC’s draft *Order on Reconsideration and Notice of Proposed Rulemaking* in MB Dockets 14-50 et al, released October 26, 2017 (the “*Draft Order*”), cannot be adopted as it is based on a fundamental misconception of the embedded market issue.¹ As detailed below, the *Draft Order* is based on the meaning given by Nielsen Audio and BIA to the designation of a radio station that is home to an embedded market as being above-the-line in the “parent” market. Attached to this letter are statements from both Nielsen Audio and BIA demonstrating that the *Draft Order*’s interpretation of the meaning of this designation is incorrect. This fundamental misconception of the nature of embedded markets, and the additional information already provided in the record of this proceeding, require the Commission to change course on this issue.

¹ The *Draft Order* rejects Connoisseur’s Petition for Reconsideration (the “*Petition for Reconsideration*”) of the Commission’s treatment of embedded markets in the *Second Report and Order* in the referenced dockets. See *2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Second Report and Order*, MB Docket Nos. 14-50, 09-182, 07-294, and 04-256, 31 FCC Rcd 9864 (2016)(“*Second Report and Order*”).

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The crux of the *Draft Order's* discussion of the embedded markets comes down to one finding – that the inclusion by Nielsen Audio of stations licensed to communities which are located in embedded markets means that Nielsen Audio has determined these stations to be competitors in both the embedded market and the greater parent market. That determination is most succinctly stated in paragraph 92 of the *Draft Order*, where it is stated:

As the Commission noted in the Second Report and Order, it has long relied on Nielsen Audio's market analysis, as reported by BIA, which lists all the stations that are deemed to compete in a given market (often referred to as "above-the-line" stations), as the basis for multiple ownership calculations for embedded and parent markets. Nielsen Audio's market definitions are recognized as the industry standard and provide for consistency and ease of application in comparison to other possible methods for defining local radio markets. *The inclusion of an embedded market station as an above-the-line station in a parent market therefore reflects a determination by Nielsen Audio that, absent other information, the station competes in that market.*²

Connoisseur believes that, even if this statement accurately described the meaning of an embedded market station being listed above-the-line, it is arbitrary for the Commission to blindly rely on the designation by two private companies as to the state of competition in the parent market when faced with the plethora of unrefuted contrary evidence in the record of this proceeding that embedded market stations do not compete in the parent market. However, there is a much more direct method of ascertaining what Nielsen Audio and BIA mean when they list an embedded market station as being above-the-line in a parent market. In light of the *Draft Order's* reliance on what Nielsen and BIA mean by an above-the-line designation in a parent market, Connoisseur has asked each of these organizations to explain what in fact is meant by the designation of embedded market stations as being above-the-line in the parent market. Statements from both BIA and Nielsen Audio are attached, as Exhibits 1 and 2 respectively, and they demonstrate that the assumptions made *Draft Order* are simply incorrect.³

As set forth in each of these statements, the inclusion of an embedded market station as being above the line in the parent market *is not based on a determination that the station*

² Footnotes omitted, emphasis added. *See, also*, the statement in the *Draft Order* at paragraph 95: "We continue to recognize that Nielsen Audio and BIA's practice of designating all embedded market stations as "home" to the parent market-regardless of actual market share-could, in some instances, result in stations being counted for multiple ownership purposes in a market in which they do not compete."

³ In the interests of time, Nielsen asked Connoisseur to summarize its understandings of the issues at hand here, and Connoisseur's understandings of the meaning of the Nielsen Audio designations. Nielsen Audio's responsive letter states: "We confirm each of the understandings described in your letter with two clarifications." Neither clarification is relevant to the discussion here. Connoisseur's letter and Nielsen's response are attached as Exhibit 2.

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competes in the parent market, but is instead simply a statement of geography. Nielsen has a policy of including any station licensed to a community located within the geographic boundaries of the political subdivisions within a market as being above-the-line in that market. As the geographical limits of the parent market by definition encompass the area within the embedded markets, and the embedded market stations are licensed to communities in those areas, they are included in the listing of above-the-line stations in the parent market. This inclusion is not based on any assessment of competition, but simply by geography. In other words, the *Draft Order's* finding that being listed above-the-line means that Nielsen has found that these stations compete in the parent market is simply wrong.⁴

Both of the Nielsen and BIA statements go on to make clear that the very reason that embedded markets exist is that the stations in these markets *do not compete in the parent market*, but instead compete locally within the embedded market. The establishment of an embedded market, as with the creation of any other Nielsen market, is Nielsen's recognition of an area where a set of stations primarily compete. If these embedded market stations all competed in the parent market as the *Draft Order* suggests, there would be no need for embedded markets at all. Instead, if all of the embedded markets stations competed in the parent market, they would simply be listed as stations in the parent market. The existence of the embedded market shows that each of these embedded markets is a unique area, like any other Nielsen market, where the stations home to that market compete.⁵

Throughout this proceeding, Connoisseur has argued, and provided substantial unrefuted and unchallenged evidence, that the only reason that the "embedded" markets have this special characterization is because the parent market stations look at these outlying areas as part of their market for listeners and part of the area which the parent-market stations can tell advertisers that they serve.⁶ It is because the parent market stations compete in the areas encompassed by the embedded markets that the special term "embedded" is applied, not because the local stations home to the embedded markets compete in the parent market. Both the BIA and Nielsen statements confirm those arguments of Connoisseur.

BIA's statement sets forth that in its list of FCC Geographic Markets, it lists what it considers to be the "home" market of each station that it considers to be part of that market. In

⁴ E.g., Statement of Mark Fratrik ("*BIA Statement*") at paragraph 9. "That listing of an embedded station in the parent market report does not reflect a determination by Nielsen Audio nor BIA/Kelsey that, absent other information, the station competes in that parent market. It just reflects that their city of license is geographically located within the boundaries of the parent market. It is a reflection of geography, not an analysis of competition."

⁵ E.g., BIA Statement at paragraphs 12-13.

⁶ See, e.g. Petition for Reconsideration at p. 4-6.

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the FCC Geographic Market reports for New York and Washington DC, attached as Exhibit 3 hereto, all of the embedded market stations are listed as being “home” to the embedded market, not to the parent market. Further, BIA, when it provides market revenue data, considers revenues for the embedded market stations to be allocable only to the embedded market, not to the parent market. The revenues listed for the parent market stations do not include the revenues of the embedded market stations, again demonstrating that BIA does not consider them to be competitors in that market that add to the market revenue of the parent market.

Given the statements of BIA and Nielsen attached to this letter, the adoption of the *Draft Order* would be arbitrary and capricious – without any record evidence to support it and refuted not only by these statements but also by all of the unchallenged record evidence already introduced by Connoisseur. The entire basis of the decision is that Nielsen Audio and BIA’s designation of an embedded market station as being above-the-line in the parent market constitutes an industry-accepted determination that these stations compete in the parent market is simply incorrect, as shown by the attached statements of Nielsen and BIA.

But, for the sake of completeness of the record, Connoisseur will also point out several other statements in the *Draft Order* that lack any basis in the record. The *Draft Order’s* reliance on a conclusion that embedded market stations compete in the parent market not only cannot be based on reliance on Nielsen and BIA, as shown above, but it also cannot be based on the unrefuted facts in the record. Connoisseur has provided convincing evidence that the embedded market stations do not in fact compete in the parent market. It has shown that, even if one party were to own every embedded market station in the every embedded market in the New York City parent market (which is impossible as that ownership would far exceed the ownership limits in each of the embedded markets⁷), it would have approximately half the market share of the two largest owners in the parent market.⁸ In the Washington DC parent market, that ownership would rank the owner of every embedded market station as at best a weak sixth in the market.⁹

Moreover, Connoisseur has provided a county-by-county breakdown of the listening of the embedded market stations. That exhibit shows that virtually all of the listening to those

⁷ For instance, as shown in Exhibit 3, in the Nassau/Suffolk embedded market, there are 46 stations that BIA lists as being home to the market, meaning that, as one party can only own 8 stations in a market of that size), there are at least 38 stations that one party could not own.

⁸ Petition for Reconsideration at p. 6 citing Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016) at Exhibit 1.

⁹ Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 6, 2017) at p. E-5.

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stations comes from listeners in the home counties of the embedded market, not from listeners in the parent market or in other embedded markets.¹⁰

The *Draft Order* suggests without any record evidence that these listening patterns could change over time. At paragraph 93, the Draft Order states that, in the embedded market situation, “the core location of a station’s listenership has the potential to shift geographically over time in a parent/embedded market scenario in a way that would be unlikely, or even impossible, where, as in Puerto Rico, the physical terrain prevents a station from reaching other geographic areas.”¹¹ This statement ignores the record evidence submitted by Connoisseur showing that the embedded market station with the greatest 1 mv/m coverage of the greater New York parent market has just over 50% coverage of that market, while the vast majority of the other embedded market stations fall below 50% market coverage – most substantially below. By contrast, the parent market station with the least coverage covers 80% of the parent market, with most parent market stations having 80% coverage.¹² A station cannot serve an area in which it does not have a signal, and the *Draft Order* seems to have ignored these facts. And there is no suggestion in the record, or any evidence cited by the Commission, that in the spectrum congested markets of New York and Washington DC these coverage areas could be changed.¹³

¹⁰ Petition for Reconsideration at fn. 7 citing Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016)(analyzing New York parent market); Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 at pp. E6-7 (filed June 6, 2017)(analyzing Washington DC parent market).

¹¹ The reference to Puerto Rico is made as, in the Petition for Reconsideration, Connoisseur contended that the rejection of Connoisseur’s argument that Nielsen Audio should not be relied on in the embedded markets was arbitrary in light of the Commission’s rejection in connection with stations in Puerto Rico of the use of Nielsen Audio market designations as the basis of decisions on compliance with the local ownership rules.

¹² Petition for Reconsideration at p. 7 citing Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016) at Exhibit 2.

¹³ Perhaps it was assumed by the *Draft Order* that embedded market stations could change transmitter sites to better serve the parent market, but that statement is not made in the *Draft Order*. Even if that is the implication, that same kind of change could be made by stations in markets like Puerto Rico – the difference being that in a parent market like New York, or even Washington DC, you are dealing with some of the most spectrum-congested areas in the country, where it simply is not possible to make widespread coverage changes. If suburban stations could have moved their transmitter sites to allow greater coverage of New York, the largest market in the country, it would be irrational to believe that this kind of coverage improvement would not have already been made.

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The *Draft Order*, in rejecting a decision to change the rules for all embedded markets, states that the waiver process is better suited to making decisions about combinations of stations in different embedded markets, as “characteristics of different embedded markets vary, including their geographic proximity to other embedded markets and to the central city of the parent market.”¹⁴ In fact, in all relevant respects to the analysis here, these embedded markets are remarkably similar. Connoisseur has shown that in all embedded markets, both in the New York and Washington parent markets, there is remarkably little commuting by residents of one embedded market to another (though all have substantial commuting to the center city).¹⁵ As set forth in the prior paragraph, the signal strength of the stations in each embedded market is insufficient to reach the majority of the parent market. And there is very little or no listening by residents of one embedded market to stations from another embedded market (though, again, there is significant listening in each embedded market to the stations from the central city).¹⁶

These embedded markets really are just like any other Nielsen Audio market and should be treated as such for local ownership purposes. Connoisseur has shown that there are many other adjacent Nielsen markets where cross-market listening far exceeds the level of such listening by residents of one embedded market to stations from other embedded markets. Yet in those other markets, one owner can own up to the maximum number of stations in each adjacent market with no Commission scrutiny.¹⁷ Denying that same treatment to licensees in embedded markets, simply because Nielsen has called them “embedded,” with no other policy reason justifying such treatment, is arbitrary.

Connoisseur is not asking for any action that would upset the Commission’s reliance on Nielsen Audio, as interpreted by BIA, as the basis of its local radio ownership analysis. Instead, it is simply asking for that same treatment to be applied to the owners of stations located exclusively in the embedded markets, as those markets really are just like any other – but for the fact that their economic environment is so much harder to operate a business as so much of the revenue is recognized by the parent market stations. Embedded market stations need to be able to recognize the economies and synergies that can be realized by owning stations in

¹⁴ Draft Order at fn. 280.

¹⁵ Petition for Reconsideration at pp. 7-8 citing Connoisseur’s Initial Comments in this proceeding filed on August 6, 2014 (“Initial Comments”) at pp. 5-7 (New York); Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 at p. E-2 (filed June 6, 2017) (Washington DC).

¹⁶ Petition for Reconsideration at pp. 7-8, citing Connoisseur’s Initial Comments at pp. 5-7 (New York); Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 at p. E-3 (filed June 6, 2017) (Washington DC).

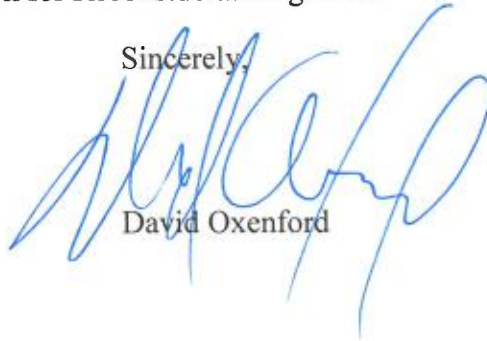
¹⁷ Letter from David Oxenford, Counsel for Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed October 17, 2017).

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geographically proximate markets. Given the lack of evidence supporting the *Draft Order*, and the specific refutation of its underlying premise by the letters of Nielsen and BIA, the conclusions of the *Draft Order* must be rejected, and Connoisseur's petition for reconsideration of the Second Report and Order must be granted.¹⁸

Connoisseur thanks the Commission for issuing the *Draft Order* so that it could be reviewed before being adopted. This new policy of issuing draft Orders was designed to increase transparency so that the Commission could have potential errors highlighted before they were adopted. That policy worked in this case, allowing Connoisseur to clarify the record.¹⁹ Connoisseur respectfully requests that the decision reflected in the *Draft Order* be changed as stated herein, and Connoisseur's Petition for Reconsideration granted.

Sincerely,



David Oxenford

Enclosures

¹⁸ Connoisseur notes that while both in Petition for Reconsideration and in a supporting filing of the NAB, methodologies were advanced to provide a guard against the abuse of the change in the treatment of embedded markets urged by Connoisseur. As the BIA Statement, at paragraph 11 makes clear, BIA already provides that guard against abuse as it will classify an embedded market station that truly competes in the parent market as being home to the parent market, as it does with station WKTU. This is exactly the same methodology that BIA uses in other markets non-embedded markets to guard against abuse of the Nielsen Audio market designations.

¹⁹ The undersigned counsel for Connoisseur and Bryan Tramont of this office had a telephonic meeting with Nirali Patel of the Office of Commissioner Carr this date to preview the contents of this filing. Mr. Tramont also spoke with Ms. Patel on October 27, 2017 to express Connoisseur's concerns about the *Draft Order* and to indicate that Connoisseur would be submitting this supplemental filing.

Exhibit 1

DECLARATION OF MARK R. FRATRIK, PH.D.

1. I am a Senior Vice President, Chief Economist at BIA/Kelsey, a research, financial and strategic consulting firm for the communications industries. I have been with this firm for nearly 17 years.
2. In that role I supervise the collection of data included in BIA/Kelsey's Media Access Pro™ database of all commercial radio and television stations and daily and weekly newspapers. I am also involved in several strategic and financial consulting engagements relating to the radio, television and related industries.
3. I have been asked by Connoisseur Media to clear up any misunderstandings as to how BIA/Kelsey treats embedded radio markets, and how BIA/Kelsey views the competition of local radio stations within and between embedded markets.
4. BIA/Kelsey has a long history of reporting embedded radio markets within its proprietary database program, Media Access Pro™, as well as the accompanying quarterly publication, *Investing In Radio*. Each of these embedded markets are treated as separate markets in all instances, with each embedded market having a separate page in the publication. Users of the database program as well as the publication want these radio markets displayed in this way. No one in my nearly 17 years at BIA/Kelsey has ever voiced a different opinion on this matter.
5. Each of these embedded markets have independent market revenue estimates reflecting the competition of radio stations within these markets. The advertising market revenue for these embedded markets are NOT included as revenue attributable to the parent market, and are the sum of the advertising revenue generated of only those radio stations listed as home to the embedded markets.

6. The revenue share attributable to each of these embedded market radio stations are those individual station revenues divided by *only* the total revenue for that embedded market since those embedded markets stations are competing against only the other stations in the embedded markets for that revenue.
7. In its Media Access Pro™ database software, there is a pre-programmed query and related report defined as the BIA/Kelsey FCC Geographic Market Reports. This report provides the listing of local radio stations located in the Nielsen Audio radio markets used to determine the number of stations in a Nielsen Audio radio market for analysis of compliance with the FCC's local radio ownership rules.
8. For the markets that include embedded markets (parent markets), that report include all stations that are listed as home to the parent market. Additionally, that report also includes all stations that have a city of license physically located within the boundaries of that parent market, per FCC Local Ownership Rules. These stations would include stations licensed to communities that are located in an embedded market.
9. That listing of an embedded station in the parent market report does not reflect a determination by Nielsen Audio nor BIA/Kelsey that, absent other information, the station competes in that parent market. It just reflects that their city of license is geographically located within the boundaries of the parent market. It is a reflection of geography, not an analysis of competition.
10. Included in those reports for these stations that are physically located in the parent market but are listed as home to another market (e.g., embedded stations) are the actual listing of that other home market in which these stations really compete. See

the most recent New York parent market FCC Geographic Market Report attached, showing that virtually all of the embedded market stations as being “home” to the embedded market in which it really competes.

11. In those rare cases where a station whose city of license is located in the embedded market *but* competes in the wider parent market, they are listed as home to the parent market. One such example is WKTU (FM), licensed to Lake Success, NY, that is geographically part of the embedded Nassau-Suffolk, NY market. Yet, because of its transmitter site and its coverage over the wider New York, NY radio market, it is effectively a competitor in that wider market, and is listed in the BIA/Kelsey database as being home to that parent market.
12. The BIA/Kelsey’s treatment of embedded market reflects economic reality of local radio markets. Users of the database software as well as the related publications want a realistic view of the competition facing each and every radio station. By considering these embedded markets as separate relevant markets, BIA/Kelsey provides that needed information.
13. It is significant to realize that Nielsen Audio (and previously Arbitron) established these embedded markets due to the demand in the marketplace. Radio stations in these embedded markets wanted audience estimates in the area in which they compete, the embedded market. If embedded market stations really competed in the parent market, there would be no need to have embedded markets. They would simply be included in the parent market audience estimates. The reason that these markets exist is because the embedded market is where the local stations compete, not in the parent market.

14. BIA/Kelsey recognizes that competition and thus generates the market pages in its publication to reflect that competition.

A handwritten signature in black ink, reading "Mark R. Fratrik". The signature is written in a cursive, flowing style.

Mark R. Fratrik, Ph. D.
Sr. Vice President, Chief Economist
BIA/Kelsey



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Station Format	Home Market	Market Designation			Owner	City & State of License	County of License
						Date	Rank	Mkt			
WABC	AM	770	C	News/Talk	New York, NY	07/02/2003	1		Cumulus Media Holdings Inc	New York, NY	New York
WADB	AM	1310	C	News/Talk	Monmouth-Ocean, NJ	07/02/2003	53		Townsquare Media Incorporated	Asbury Park, NJ	Monmouth
WADO	AM	1280	C	SpNws/Sprt	New York, NY	07/02/2003	1		Univision	New York, NY	New York
WALK	AM	1370	C	Adlt Strndrd	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Patchogue, NY	Suffolk
WALK	FM	97.5	C	Hot AC	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Patchogue, NY	Suffolk
WANR	FM	88.5	NC	Nws/Tlk/Inf	Hudson Valley, NY	07/25/2014	40		WAMC/Northeast Public Radio	Brewster, NY	Putnam
WARY	FM	88.1	NC	Variety	Hudson Valley, NY	10/28/2011	40		Westchester Community College	Valhalla, NY	Westchester
WAWZ	FM	99.1	C	ChrsContem	Middlesex-Somerset-Union, NJ	07/02/2003	42		Pillar of Fire	Zarephath, NJ	Somerset
WAXQ	FM	104.3	C	Clsc Rock	New York, NY	07/02/2003	1		iHeartMedia	New York, NY	New York
WBAB	FM	102.3	C	Clsc Rock	Nassau-Suffolk, NY	07/02/2003	20		Cox Media Group	Babylon, NY	Suffolk
WBAI	FM	99.5	NC	Eclectic	New York, NY	07/02/2003	1		Pacifica Foundation, Inc	New York, NY	New York
WBAZ	FM	102.5	C	AC	Nassau-Suffolk, NY	07/20/2010	20		LRS Radio LLC	Bridgehampton, NY	Suffolk
WBRR	AM	1130	C	Bus News	New York, NY	07/02/2003	1		Bloomberg Communications Inc	New York, NY	New York
WBEA	FM	101.7	C	CHR	Nassau-Suffolk, NY	07/20/2010	20		LRS Radio LLC	Southold, NY	Suffolk
WBG0	FM	88.3	NC	Jazz	New York, NY	07/02/2003	1		Newark Public Radio Inc	Newark, NJ	Essex
WBJB	FM	90.5	NC	AAA/NPR	Monmouth-Ocean, NJ	07/02/2003	53		Brookdale Community College	Lincroft, NJ	Monmouth
WBLI	FM	106.1	C	CHR	Nassau-Suffolk, NY	07/02/2003	20		Cox Media Group	Patchogue, NY	Suffolk
WBLS	FM	107.5	C	Urban AC	New York, NY	07/02/2003	1		Emmis Communications	New York, NY	New York
WBMP	FM	92.3	C	CHR	New York, NY	07/02/2003	1		CBS Radio	New York, NY	New York
WBON	FM	98.5	C	Latino	Nassau-Suffolk, NY	07/02/2003	1		CBS Radio	Westhampton, NY	Suffolk
WBZO	FM	103.1	C	Clsc Hits	Nassau-Suffolk, NY	07/20/2010	20		JVC Media LLC	Bay Shore, NY	Suffolk
WCBS	FM	101.1	C	Oldies	New York, NY	07/02/2003	1		Connoisseur Media Limited Liability Company	New York, NY	New York
WCBS	AM	880	C	News	New York, NY	07/02/2003	1		CBS Radio	New York, NY	New York
WCTC	AM	1450	C	Talk	Middlesex-Somerset-Union, NJ	07/02/2003	42		Beasley Media Group	New Brunswick, NJ	Middlesex
WCWP	FM	88.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20		Long Island University Public Radio	Brookville, NY	Nassau
WDBY	FM	105.5	C	Country	Danbury, CT	07/02/2003	201		Townsquare Media Incorporated	Patterson, NY	Putnam
WDHA	FM	105.5	C	Clsc Rock	Morristown, NJ	07/02/2003	121		Beasley Media Group	Dover, NJ	Morris
WEBE	FM	107.9	C	AC	Stamford-Norwalk, CT	07/02/2003	149		Cumulus Media Holdings Inc	Westport, CT	Fairfield
WEDW	FM	88.5	NC	News/Talk	Stamford-Norwalk, CT	07/02/2003	149		Connecticut Public Broadcasting Incorporated	Stamford, CT	Fairfield
WEER	FM	88.7	NC	Public Svc	Nassau-Suffolk, NY	08/30/2006	20		Eastern Tower Corp	Montauk, NY	Suffolk
WEGB	FM	90.7	NC	Religion	Nassau-Suffolk, NY	10/31/2011	20		Community Bible Church	Napeague, NY	Suffolk
WEGQ	FM	91.7	NC	Religion	Nassau-Suffolk, NY	06/27/2013	20		Community Bible Church	Quogue, NY	Suffolk
WEHM	FM	92.9	C	AAA	Nassau-Suffolk, NY	07/15/2010	20		LRS Radio LLC	Manorville, NY	Suffolk

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Market		Home Market	Designation	Mkt Rank	Owner	City & State of License	County of License
				Station	Format		Date				
WEHN	FM	96.9	C	AAA		Nassau-Suffolk, NY	07/20/2010	20	LRS Radio LLC	East Hampton, NY	Suffolk
WELJ	FM	104.7	C	Soft AC		New London, CT	07/02/2003	179	Bold Broadcasting LLC	Montauk, NY	Suffolk
WEPN	FM	98.7	C	Sports		New York, NY	07/02/2003	1	Emmis Communications	New York, NY	New York
WEPN	AM	1050	C	Span/Sprts		New York, NY	07/02/2003	1	ABC/Disney	New York, NY	New York
WFAN	FM	101.9	C	Sprts/Talk		New York, NY	07/02/2003	1	CBS Radio	New York, NY	New York
WFAN	AM	660	C	Sprts/Talk		New York, NY	07/02/2003	1	CBS Radio	New York, NY	New York
WFAS	AM	1230	C	News/Talk		Hudson Valley, NY	10/28/2011	40	Cumulus Media Holdings Inc	White Plains, NY	Westchester
WFDU	FM	89.1	NC	CHits/Oldies		New York, NY	07/02/2003	1	Fairleigh Dickinson University	Teaneck, NJ	Bergen
WFME	FM	106.3	NC	Religion		Hudson Valley, NY	07/02/2003	40	Family Stations Incorporated	Mount Kisco, NY	Westchester
WFME	AM	1560	C	Religion		New York, NY	07/02/2003	1	Family Stations Incorporated	New York, NY	New York
WFMU	FM	91.1	NC	Variety		New York, NY	07/02/2003	1	Auricle Communications	East Orange, NJ	Essex
WFRS	FM	88.9	NC	Religion		Nassau-Suffolk, NY	07/02/2003	20	Family Stations Incorporated	Smithtown, NY	Suffolk
WFTU	AM	1570	C	Alternative		Nassau-Suffolk, NY	07/20/2010	20	Five Towns College	Riverhead, NY	Suffolk
WFUV	FM	90.7	NC	AAA		New York, NY	07/02/2003	1	Fordham University	New York, NY	New York
WGBB	AM	1240	C	Asian/Varty		Nassau-Suffolk, NY	07/02/2003	20	WGBB-AM Inc	Freeport, NY	Nassau
WGCH	AM	1490	C	Nws/Tlk/BN		Stamford-Norwalk, CT	07/02/2003	149	Forte Family Broadcasting Inc	Greenwich, CT	Fairfield
WGHT	AM	1500	C	Oldies		New York, NY	07/02/2003	1	Mariana Broadcasting Inc	Pompton Lakes, NJ	Passaic
WGSS	FM	89.3	NC	Religion		Nassau-Suffolk, NY	04/24/2012	20	Calvary Chapel of Hope	Copague, NY	Suffolk
WHCR	FM	90.3	NC	Variety		New York, NY	07/02/2003	1	City College of New York	New York, NY	New York
WHFM	FM	95.3	C	Cisc Rock		Nassau-Suffolk, NY	07/20/2010	20	Cox Media Group	Southampton, NY	Suffolk
WHLI	AM	1100	C	Adlt Stndrd		Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Hempstead, NY	Nassau
WHPC	FM	90.3	NC	Variety		Nassau-Suffolk, NY	07/02/2003	20	Nassau Community College	Garden City, NY	Nassau
WHTG	AM	1410	C	Oldies		Monmouth-Ocean, NJ	07/02/2003	53	Press Communications LLC	Eatontown, NJ	Monmouth
WHTZ	FM	100.3	C	CHR		New York, NY	07/02/2003	1	iHeartMedia	Newark, NJ	Essex
WHUD	FM	100.7	C	AC		Hudson Valley, NY	10/28/2011	40	Pamal Broadcasting Ltd	Peekskill, NY	Westchester
WINS	AM	1010	C	News		New York, NY	07/02/2003	1	CBS Radio	New York, NY	New York
WJDM	AM	1530	C	Span/Chrst		Middlesex-Somerset-Union, NJ	07/02/2003	42	MultiCultural Radio Broadcasting Inc	Elizabeth, NJ	Union
WJUF	FM	94.9	C	News/Talk		Nassau-Suffolk, NY	02/29/2012	20	Red Wolf Broadcasting Corporation	Montauk, NY	Suffolk
WJLK	FM	94.3	C	Hot AC		Monmouth-Ocean, NJ	07/02/2003	53	Townsquare Media Incorporated	Asbury Park, NJ	Monmouth
WJSV	FM	90.5	NC	Eclectic		Morristown, NJ	07/02/2003	121	Morris School District	Morristown, NJ	Morris
WJVC	FM	96.1	C	Country		Nassau-Suffolk, NY	07/02/2003	20	JVC Media LLC	Center Moriches, NY	Suffolk
WKCR	FM	89.9	NC	Alt/Jaz/Var		New York, NY	07/02/2003	1	Columbia University	New York, NY	New York
WKDM	AM	1380	C	Asian/Mexcn		New York, NY	07/02/2003	1	MultiCultural Radio Broadcasting Inc	New York, NY	New York

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FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Market			Home Market	Designation	Date	Rank	Owner	City & State of License	County of License
				Designation	Home	Mkt							
WKJY	FM	98.3	C	AC	Nassau-Suffolk, NY	20	p	07/02/2003	20	1	Connoisseur Media Limited Liability Company	Hempstead, NY	Nassau
WKLV	FM	96.7	NC	ChrsContem	Hudson Valley, NY	40		10/28/2011	40		Educational Media Foundation	Port Chester, NY	Westchester
WKMB	AM	1070	C	Black Gospel	Morristown, NJ	121		07/02/2003	121		King's Temple Ministry Inc	Stirling, NJ	Morris
WKMK	FM	106.3	C	Country	Monmouth-Ocean, NJ	53		07/02/2003	53		Press Communications LLC	Eatontown, NJ	Monmouth
WKNJ	FM	90.3	NC	Variety	Middlesex-Somerset-Union, NJ	42		07/02/2003	42		Kean University	Union Township, NJ	Union
WKRK	FM	90.3	NC	Rhymc/Dan	New York, NY	1		07/02/2003	1		Kingsborough Community College	Brooklyn, NY	Kings
WKTU	FM	103.5	C	CHR/Rhymc	New York, NY	1		07/02/2003	1		iHeartMedia	Lake Success, NY	Nassau
WKWZ	FM	88.5	NC	Variety	Nassau-Suffolk, NY	20		07/02/2003	20		Syosset Central School District	Syosset, NY	Nassau
WLJB	AM	1190	C	Black Gospel	New York, NY	1		07/02/2003	1		Emmis Communications	New York, NY	New York
WLIE	AM	540	C	Spani/Chrst	Nassau-Suffolk, NY	20		07/02/2003	20		Principle Broadcasting Network LLC	Islip, NY	Suffolk
WLIM	AM	1580	C	Polish	Nassau-Suffolk, NY	20		07/02/2003	20		Polnet Communications Ltd	Patchogue, NY	Suffolk
WLIR	FM	107.1	C	ChrsContem	Nassau-Suffolk, NY	20		07/20/2010	20		Livingstone Broadcasting Inc	Hampton Bays, NY	Suffolk
WLNK	AM	1420	C	Country	Poughkeepsie, NY	169		10/28/2011	169		Pamal Broadcasting Ltd	Peekskill, NY	Westchester
WNLG	FM	92.1	C	Nws/Inf/Old	Nassau-Suffolk, NY	20		07/20/2010	20		Main Street Broadcasting Co Inc	Sag Harbor, NY	Suffolk
WLTW	FM	106.7	C	Lite AC	New York, NY	1		07/02/2003	1		iHeartMedia	New York, NY	New York
WMCA	AM	570	C	Chrst/Talk	New York, NY	1		07/02/2003	1		Salem Media Group Inc	New York, NY	New York
WMCX	FM	88.9	NC	Alternative	Monmouth-Ocean, NJ	53		07/02/2003	53		Monmouth University	West Long Branch, NJ	Monmouth
WMGQ	FM	98.3	C	Rock AC	Middlesex-Somerset-Union, NJ	42		07/02/2003	42		Beasley Media Group	New Brunswick, NJ	Middlesex
WMSC	FM	90.3	NC	Alternative	New York, NY	1		07/02/2003	1		Montclair State University	Upper Montclair, NJ	Essex
WMTR	AM	1250	C	Clisc Hits	Morristown, NJ	121		07/02/2003	121		Beasley Media Group	Morristown, NJ	Morris
WNBK	FM	103.9	C	Urban AC	Hudson Valley, NY	40		10/28/2011	40		Cumulus Media Holdings Inc	Bronxville, NY	Westchester
WNEW	FM	102.7	C	Hot AC	New York, NY	1		07/02/2003	1		CBS Radio	New York, NY	New York
WNLK	AM	1350	NC	NPR/Nws/TTI	Stamford-Norwalk, CT	149		07/02/2003	149		Sacred Heart University Incorporated	Norwalk, CT	Fairfield
WNSH	FM	94.7	C	Country	New York, NY	1		10/28/2011	1		Cumulus Media Holdings Inc	Newark, NJ	Essex
WNSW	AM	1430	NC	Reign/Talk	New York, NY	1		07/02/2003	1		Starboard Media Foundation Inc D/B/A/Relevant	Newark, NJ	Essex
WNYC	AM	820	NC	News/Talk	New York, NY	1		07/02/2003	1		New York Public Radio	New York, NY	New York
WNYC	FM	93.9	NC	News/Talk	New York, NY	1		07/02/2003	1		New York Public Radio	New York, NY	New York
WNYE	FM	91.5	NC	Educa/Varty	New York, NY	1		07/02/2003	1		NYC Dept of Inf Tech & Telecom	New York, NY	New York
WNYG	AM	1440	C	Span/Chrst	Nassau-Suffolk, NY	20		07/02/2003	20		Radio Canticco Nuevo Inc	Medford, NY	Suffolk
WNYH	AM	740	C	Span/Chrst	Nassau-Suffolk, NY	20		07/02/2003	20		Win Radio Broadcasting Corporation	Huntington, NY	Suffolk
WNYK	FM	88.7	NC	Rck/Alt/Cst	Hudson Valley, NY	40		10/28/2011	40		Nyack College	Nyack, NY	Rockland
WNYM	AM	970	C	News/Talk	New York, NY	1		07/02/2003	1		Salem Media Group Inc	Hackensack, NJ	Bergen
WNYU	FM	89.1	NC	Alternative	New York, NY	1		07/02/2003	1		New York University	New York, NY	New York

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Type		Home Market	Market		City & State of License	County of License
		Freq	Station		Designtn	Home Mkt		
					Date	Rank	Owner	
WOR	AM	710	C	News/Talk	New York, NY	1	iHeartMedia	New York, NY
WOSS	FM	91.1	NC	Variety	Hudson Valley, NY	40	Union Free School District #1	Ossining, NY
WPAT	AM	930	C	Ethnc/Intnl	New York, NY	1	MultiCultural Radio Broadcasting Inc	Paterson, NJ
WPAT	FM	93.1	C	Spanish AC	New York, NY	1	Spanish Broadcasting System	Paterson, NJ
WPDI	FM	103.9	NC	Span/Chrst	Monmouth-Ocean, NJ	53	Cantico Nuevo Ministry Inc	Hazlet, NJ
WPLJ	FM	95.5	C	Hot AC	New York, NY	1	Cumulus Media Holdings Inc	New York, NY
WPOB	FM	88.5	NC	Variety	Nassau-Suffolk, NY	20	Plainview-Old Bethpage Central School District	Nassau
WPPB	FM	88.3	NC	NPR/Nws/Ja	Nassau-Suffolk, NY	20	Peconic Public Broadcasting	Suffolk
WPSC	FM	88.7	NC	Alternative	New York, NY	1	William Patterson College of New Jersey	Passaic
WPTY	FM	105.3	C	Rhymc/Dan	Nassau-Suffolk, NY	20	JVC Media LLC	Suffolk
WPUT	FM	90.1	NC	Jazz/AdStd	Hudson Valley, NY	40	Vineyard Public Radio Inc	Westchester
WQBU	FM	92.7	C	Mexican	Nassau-Suffolk, NY	20	Univision	Nassau
WQHT	FM	97.1	C	HpHop/Rhy	New York, NY	1	Emmis Communications	New York
WQXR	FM	105.9	NC	Classical	New York, NY	1	New York Public Radio	Essex
WQXW	FM	90.3	NC	Classical	Hudson Valley, NY	40	New York Public Radio	Westchester
WRCN	FM	103.9	C	News/Talk	Nassau-Suffolk, NY	20	JVC Media LLC	Suffolk
WRCR	AM	1700	C	Nws/Tlk/SA	Hudson Valley, NY	40	Alexander Broadcasting Inc	Rockland
WRDR	FM	89.7	NC	Christian	Monmouth-Ocean, NJ	53	Bridgellight LLC	Monmouth
WRHU	FM	88.7	NC	Variety	Nassau-Suffolk, NY	20	Hofstra University	Nassau
WRIV	AM	1390	C	Adlt Strndr	Nassau-Suffolk, NY	20	Crystal Coast Communications Inc	Suffolk
WRKL	AM	910	C	Polish	Hudson Valley, NY	40	Polnet Communications Ltd	Rockland
WRLI	FM	91.3	NC	News/Talk	Nassau-Suffolk, NY	20	Connecticut Public Broadcasting Incorporated	Suffolk
WRPR	FM	90.3	NC	CHR	New York, NY	1	Ramapo College of New Jersey	Bergen
WRSU	FM	88.7	NC	Alternative	Middlesex-Somerset-Union, NJ	42	Rutgers University Board of Governors	Middlesex
WRVP	AM	1310	NC	Span/Chrst	Hudson Valley, NY	40	Radio Vision Cristiana Management	Westchester
WSHR	FM	91.9	NC	CHR/Varty	Nassau-Suffolk, NY	20	Sachem Central School District Holbrook	Suffolk
WSHU	AM	1260	NC	NPR/Nws/TI	New Haven, CT	122	Sacred Heart University Incorporated	Fairfield
WSIA	FM	88.9	NC	Alternative	New York, NY	1	College of Staten Island	Fairfield
WSKQ	FM	97.9	C	Tropical	New York, NY	1	Spanish Broadcasting System	Richmond
WSLX	FM	91.9	NC	Variety	Stamford-Norwalk, CT	149	Saint Luke's Foundation Inc	New York
WSNR	AM	620	C	Ethnic	New York, NY	1	Davidzon Radio Inc	Fairfield
WSOU	FM	89.5	NC	Rock	New York, NY	1	Seton Hall University	Hudson
WSTC	AM	1400	NC	NPR/Nws/TI	Stamford-Norwalk, CT	149	Sacred Heart University Incorporated	Essex
								Fairfield

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Station Type	Format	Home Market	Market		City & State of License	County of License
						Designtn Date	Home Mkt Rank		
WSUF	FM	89.9	NC	NPR/Nws/TT	Nassau-Suffolk, NY	07/20/2010	20	Sacred Heart University Incorporated	Suffolk
WTHE	AM	1520	C	Gospel	Nassau-Suffolk, NY	07/02/2003	20	Universal Broadcasting	Nassau
WUSB	FM	90.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	State University of New York	Suffolk
WWIP	FM	93.5	C	Ethnic	Hudson Valley, NY	10/28/2011	40	Hudson Westchester	Westchester
WWNJ	AM	1160	C	News/Talk	New York, NY	07/02/2003	1	Universal Broadcasting	Bergen
WVOX	AM	1460	C	Nws/TTk/Inf	Hudson Valley, NY	10/28/2011	40	Hudson Westchester	Westchester
WWPH	FM	90.3	NC	Rock/Urban	Middlesex-Somerset-Union, NJ	07/02/2003	42	Piscataway Board of Education	Middlesex
WWES	FM	88.9	NC	Nws/TTk/Inf	Hudson Valley, NY	10/28/2011	40	WAMC/Northeast Public Radio	Westchester
WWPR	FM	105.1	C	Urban	New York, NY	07/02/2003	1	iHeartMedia	New York
WWPT	FM	90.3	NC	Variety	Stamford-Norwalk, CT	07/02/2003	149	Westport Board of Education	Fairfield
WWRL	AM	1600	C	Asian	New York, NY	07/02/2003	1	NJ Broadcasting LLC	New York
WWRU	AM	1660	C	Korean	New York, NY	07/02/2003	1	MultiCultural Radio Broadcasting Inc	Hudson
WWRV	AM	1330	NC	Span/Chrst	New York, NY	07/02/2003	1	Radio Vision Cristiana Management	New York
WWSK	FM	94.3	C	Rock	Nassau-Suffolk, NY	07/02/2003	20	Connoisseur Media Limited Liability Company	Suffolk
WWTR	AM	1170	C	Ethnic	Middlesex-Somerset-Union, NJ	07/02/2003	42	EBC Music Inc	Somerset
WWZY	FM	107.1	C	Modern AC	Monmouth-Ocean, NJ	07/02/2003	53	Press Communications LLC	Monmouth
WXBA	FM	88.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Brentwood Union Free School District	Suffolk
WXMC	AM	1310	C	Asian	Morristown, NJ	07/02/2003	121	World India Radio LLC	Morris
WXNY	FM	96.3	C	Spanish AC	New York, NY	07/02/2003	1	Univision	New York
WXPB	FM	107.1	C	Rock	Hudson Valley, NY	10/28/2011	40	Pamal Broadcasting Ltd	Westchester
WYGG	FM	88.1	NC	Ethnc/Relgn	Monmouth-Ocean, NJ	07/02/2003	53	Minority Business & Housing Development Inc	Monmouth
WZRC	AM	1480	C	Asian	New York, NY	07/02/2003	1	MultiCultural Radio Broadcasting Inc	New York

Number of Stations in Geographic Market 154

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Exhibit 2



October 30, 2017

Jeffrey Warshaw
CEO
Connoisseur Media, LLC
180 Post Road East, Suite 201
Westport, CT 06880

Dear Jeff:

Thank you for your letter regarding embedded market stations. We confirm each of the understandings described in your letter with two clarifications.

First, we believe that the FCC's assessment of local radio station ownership limits is informed by home to metro status as determined by BIA Kelsey. BIA Kelsey is not affiliated with Nielsen.

Second, while Nielsen automatically assigns a local radio station as Home to the Metro if the station's city of license is located within a Nielsen radio Metro Survey Area, our Home-to-Metro status is not limited solely to geographical boundaries. Nielsen also grants requests from subscribing stations that are licensed by the FCC to geographies located beyond the borders of a Nielsen metro to be listed as home to a Nielsen metro. We call this "Elective Metro Home Status." For this and other reasons, BIA Kelsey's home to metro designation may differ in some cases from Nielsen's classification.

As always, thank you for your business and leadership. Please let us know if we can help with any further information.

Regards,

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Rose".

Bill Rose
Senior Vice President, Local Media Product Leadership

Cc: Brad Kelly, Managing Director, Nielsen Audio
Daniel Monistere, SVP Policies and Guidelines
Denise Safko, VP, Product Leadership
Ryan Samuels, Director, Audio Policy
John Nolan, VP Sales Director, Nielsen Audio



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85 Broad Street
New York, NY 10004
tel 646-362-0243 cell 609-658-9167
www.nielsen.com



October 27, 2017

Bill Rose
Senior Vice President – Local Media Product Leadership
Nielsen Audio
85 Broad St
New York, NY 10004

Re: Embedded Market Stations

Dear Bill:

As you know, Connoisseur Media LLC has requested that the Federal Communications Commission change its treatment, for purposes of analyzing the local radio ownership rules, of stations located in embedded markets. Connoisseur has been contending that stations that are home to embedded markets are not true competitors in the greater “parent” market, and that Nielsen’s including them above-the-line in the parent market ratings books does not reflect any reasoned determination by Nielsen that these stations are true competitors in the parent market, but instead it merely acknowledges that they are stations with a city of license that is geographically located within the geographic boundaries of the parent market. In other words, being listed above-the-line is simply a statement of geography, not an analysis of actual competition.

It is our understanding that, if the embedded market stations were truly competitors in the greater parent market, there would be no need for embedded markets at all. If, for instance, stations licensed to Monmouth County or Nassau/Suffolk were really looking to be competitors in New York, then there would be no need for an embedded market report, as these stations would simply be included in the New York ratings book. Instead, each embedded market was created to acknowledge that these markets were markets unto themselves, where the stations home to those markets compete among themselves instead of in the greater parent market.

These geographic areas are considered “embedded” not because the local stations in those markets compete in the greater parent market, but instead because the stations from the heart of the parent market compete in the counties or other geographic subdivisions that comprise the embedded market. The geographic areas Nielsen has identified as “embedded” are a reflection that these areas are part of the area from which stations home to the core of the parent market look to draw listeners and revenue.

The fact that stations home to the embedded market are listed as “above-the-line” in the parent market is not, as suggested by the FCC in its draft decision on the ownership rules, any determination by Nielsen that these stations compete in that parent market. Instead it is merely an acknowledgement that these stations are licensed to communities that happen to fall within the geographic boundaries of the greater parent market. We understand that it is Nielsen’s policy

to list above-the-line any station licensed to a community in a geographic area that is included within the boundaries of a market. It is a geographic determination, not a competitive one.

Could you confirm these understandings? Your response will be very helpful in our attempts to convince the FCC that they have read more than you intended into your listing of embedded market stations as being above-the-line in the parent market.

Thank you for your assistance on this matter, and please let us know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey D. Warshaw". The signature is stylized with a large, sweeping "J" and "W".

Jeffrey D. Warshaw

CEO

Connoisseur Media, LLC

Exhibit 3



FCC Geographic Market Definition for Nassau-Suffolk, NY

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market			City & State of License	County of License
							Designtn	Home Mkt	Owner		
							Date	Rank			
WALK	AM	1370	C	Adlt Stndrd	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Suffolk
WALK	FM	97.5	C	Hot AC	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Suffolk
WBAB	FM	102.3	C	Cisc Rock	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Cox Media Group	Suffolk
WBAZ	FM	102.5	C	AC	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		LRS Radio LLC	Suffolk
WBEA	FM	101.7	C	CHR	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		LRS Radio LLC	Suffolk
WBLI	FM	106.1	C	CHR	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Cox Media Group	Suffolk
WBON	FM	98.5	C	Latino	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		JVC Media LLC	Suffolk
WBZO	FM	103.1	C	Cisc Hits	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Suffolk
WCWP	FM	88.1	NC	Variety	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Long Island University Public Radio	Nassau
WEER	FM	88.7	NC	Public Svc	Nassau-Suffolk, NY	Nassau-Suffolk, NY	08/30/2006	20		Eastern Tower Corp	Suffolk
WEGB	FM	90.7	NC	Religion	Nassau-Suffolk, NY	Nassau-Suffolk, NY	10/31/2011	20		Community Bible Church	Suffolk
WEGQ	FM	91.7	NC	Religion	Nassau-Suffolk, NY	Nassau-Suffolk, NY	06/27/2013	20		Community Bible Church	Suffolk
WEHM	FM	92.9	C	AAA	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/15/2010	20		LRS Radio LLC	Suffolk
WEHN	FM	96.9	C	AAA	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		LRS Radio LLC	Suffolk
WFRS	FM	88.9	NC	Religion	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Family Stations Incorporated	Suffolk
WFTU	AM	1570	C	Alternative	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		Five Towns College	Suffolk
WGBB	AM	1240	C	Asian/Varty	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		WGGB-AM Inc	Nassau
WGSS	FM	89.3	NC	Religion	Nassau-Suffolk, NY	Nassau-Suffolk, NY	04/24/2012	20		Calvary Chapel of Hope	Suffolk
WHFM	FM	95.3	C	Cisc Rock	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		Cox Media Group	Suffolk
WHLI	AM	1100	C	Adlt Stndrd	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Nassau
WHPC	FM	90.3	NC	Variety	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Nassau Community College	Nassau
WJFF	FM	94.9	C	News/Talk	Nassau-Suffolk, NY	Nassau-Suffolk, NY	02/29/2012	20		Red Wolf Broadcasting Corporation	Suffolk
WJVC	FM	96.1	C	Country	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		JVC Media LLC	Suffolk
WKJY	FM	98.3	C	AC	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	p	Connoisseur Media Limited Liability Company	Nassau
WKUT	FM	103.5	C	CHR/Rhymc	New York, NY	Nassau-Suffolk, NY	07/02/2003	1		iHeartMedia	Nassau
WKWZ	FM	88.5	NC	Variety	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Syosset Central School District	Nassau
WLIE	AM	540	C	Span/Chrst	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Principle Broadcasting Network LLC	Suffolk
WLIM	AM	1580	C	Polish	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Polnet Communications Ltd	Suffolk
WLIR	FM	107.1	C	ChrsContem	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		Livingstone Broadcasting Inc	Suffolk
WLNK	FM	92.1	C	Nws/Inf/Old	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20		Main Street Broadcasting Co Inc	Suffolk
WNYG	AM	1440	C	Span/Chrst	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Radio Cantico Nuevo Inc	Suffolk
WNYH	AM	740	C	Span/Chrst	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Win Radio Broadcasting Corporation	Suffolk
WPOB	FM	88.5	NC	Variety	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20		Plainview-Old Bethpage Central School District	Nassau

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Nassau-Suffolk, NY

Call Letters	AM/FM	Freq	Station Type	Format	Home Market	Market Designtn		Owner	City & State of License	County of License
						Date	Home Mkt Rank			
WPPB	FM	88.3	NC	NPR/Nws/Ja	Nassau-Suffolk, NY	07/20/2010	20	Peconic Public Broadcasting	Southampton, NY	Suffolk
WPTY	FM	105.3	C	Rhymc/Dan	Nassau-Suffolk, NY	07/20/2010	20	JVC Media LLC	Calverton-Roanoke, NY	Suffolk
WQBU	FM	92.7	C	Mexican	Nassau-Suffolk, NY	07/02/2003	20	Univision	Garden City, NY	Nassau
WRCN	FM	103.9	C	News/Talk	Nassau-Suffolk, NY	07/20/2010	20	JVC Media LLC	Riverhead, NY	Suffolk
WRHU	FM	88.7	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Hofstra University	Hempstead, NY	Nassau
WRIV	AM	1390	C	Adlt Stndrd	Nassau-Suffolk, NY	07/20/2010	20	Crystal Coast Communications Inc	Riverhead, NY	Suffolk
WRLI	FM	91.3	NC	News/Talk	Nassau-Suffolk, NY	07/20/2010	20	Connecticut Public Broadcasting Incorporated	Southampton, NY	Suffolk
WSHR	FM	91.9	NC	CHR/Varty	Nassau-Suffolk, NY	07/02/2003	20	Sachem Central School District Holbrook	Lake Ronkonkoma, NY	Suffolk
WSUF	FM	89.9	NC	NPR/Nws/TI	Nassau-Suffolk, NY	07/20/2010	20	Sacred Heart University Incorporated	Noyack, NY	Suffolk
WTHE	AM	1520	C	Gospel	Nassau-Suffolk, NY	07/02/2003	20	Universal Broadcasting	Mineola, NY	Nassau
WUSB	FM	90.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	State University of New York	Stony Brook, NY	Suffolk
WWSK	FM	94.3	C	Rock	Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Smithtown, NY	Suffolk
WXBA	FM	88.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Brentwood Union Free School District	Brentwood, NY	Suffolk

Number of Stations in Geographic Market 46

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Exhibit B

Ex Parte Letter filed by Connoisseur Media on October 17, 2017

October 17, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication
Review of Local Radio Ownership Rules - Embedded Radio Markets
MB Docket Nos. 09-182 and 14-50**

Dear Ms. Dortch:

In a recent meeting with Commissioner Carr and his legal assistant, questions were asked counsel for Connoisseur Media LLC (Connoisseur) about its proposal that, in assessing compliance with the local radio ownership limits in embedded markets, only the ownership in the embedded market should be assessed when reviewing the ownership of an owner who does not have stations in the core of the parent market. This supplement is to address the questions that were raised – demonstrating that the competitive impact of allowing owners to acquire stations in multiple embedded markets would not create any undue concentration in those markets. The information submitted below and in the attachments demonstrates instead that the current treatment of owners of embedded market stations is arbitrary and capricious. The rules that apply to all other radio markets allow one owner to own the full number of stations allowed in adjacent Nielsen radio markets even where the cross-market listening is far greater than that in the embedded markets.

In Connoisseur's initial Comments in this proceeding, it attached a table showing the market share of stations licensed to the New York embedded markets in each of the other embedded markets. That chart demonstrated that, while the central city New York stations had audience shares exceeding 50% of the audience in each of the embedded markets, the audience share of the stations from one embedded market in another was negligible. At the greatest, stations from Nassau/Suffolk had a 7.6% share in the Stamford/Norwalk market.¹ In no other embedded market did the audience share of the stations from another embedded market exceed

¹ See Comments of Connoisseur Media, LLC, MB Docket Nos. 09-182 and 14-50, at Attachment E (filed Aug. 6, 2014).

Marlene H. Dortch, Secretary

October 17, 2017

Page 2

3.3%.² This cross-market level of listening in adjacent markets is far less than that permitted in dozens of other markets nationwide where stations from one market receive significant market share in another, yet one owner can own the maximum number of stations in each market, something forbidden to the owners of stations in the embedded markets.

Connoisseur has looked at the audience shares of out-of-market stations in numerous markets that are adjacent to other radio markets. While this sample of markets is nowhere near a complete index of the listenership in all situations where there are adjacent markets, Connoisseur has assembled and submitted the attached sample markets as illustrative of cross-market listening permitted under the rules. It has no reason to believe that these results are unusual. This review of adjacent markets clearly demonstrates that the ownership rules contemplate some out-of-market listening in all adjacent radio markets, without limiting the number of stations that an owner can hold in either adjacent market – exactly the opposite of the effect of the current policy for embedded markets.

For instance, in the attached market surveys, looking at the Hudson Valley embedded market – the greatest audience share from any other embedded market is the 3.3 cumulative share of listening to stations in Nassau/Suffolk. Yet stations from the Poughkeepsie market have a greater 3.4% of the listening in the Hudson Valley, and stations from the Hudson Valley market have a 16.2 share in Poughkeepsie, yet one owner would not be restricted from owning the maximum number of station in each of these markets.

The same is true for the Stamford/Norwalk market, where stations from the embedded Nassau/Suffolk market have a 5.4% share (at the time of Connoisseur's initial filing it was 7.6%), while stations from Bridgeport have a higher 10.8 share and no ownership limits. Stamford/Norwalk stations similarly had a 12.6 share in Bridgeport, while stations from New York had a 22.2 share in Bridgeport, and those from New Haven a 15.2 share, yet there are no ownership limits on the cross-ownership of stations in these markets.

Other markets have even greater cross-market audience shares with no corresponding ownership limits. At the meeting with Commissioner Carr, counsel noted the adjacency of the Mobile and Pensacola markets, where stations from each market have their antennas located at a single antenna farm, yet there are no ownership limits restricting one owner from holding the maximum number of stations allowed under the ownership rules in each of these markets. In Mobile, stations from Pensacola capture 12.6% of the listening audience, while in Pensacola; Mobile stations have a 26.5% market share.

Another example comes from the adjacent Oshkosh/Appleton and Green Bay markets. In Oshkosh/Appleton, Green Bay stations receive 25.5% of the listening audience, while in Green

² Connoisseur has also submitted similar information for the Washington DC embedded markets, showing virtually no listening by residents in one DC embedded market to stations coming from the other DC embedded market. See Supplemental Ex Parte Statement filed by Connoisseur Media, LLC, at Attachment (filed June 6, 2017).

Marlene H. Dortch, Secretary

October 17, 2017

Page 3

Bay, Appleton/Oshkosh stations have a 38.8 share. Yet there are no limits on one owner having the maximum number of stations permitted in each of these markets.

Additional examples abound. In Springfield, Massachusetts, stations from the adjacent Hartford, Connecticut market have a 31.4% share of the audience. In New Haven, Hartford stations command 29.5% of the audience, while those from adjacent Bridgeport get an 8.2 share, all more than stations from any embedded market receive in any other embedded market.

In the Trenton, NJ market, fully 45.8% of the audience listens to Philadelphia stations and another 12.5% to New York stations, and cross-ownership of stations up to the limits of ownership in each is allowed. Even stations from the embedded Middlesex/Somerset/Union market have an 8.1 share in Trenton, yet owners from that market are not barred from owning stations in Trenton, even though that market share is more than stations from any embedded market have in any other embedded market.

These facts further demonstrate what Connoisseur has been arguing throughout this proceeding, that the dual multiple ownership analysis applied to the ownership of stations in embedded markets is arbitrary and capricious. When an owner does not have core market stations, its proposed ownership in any embedded market should be analyzed only in that embedded market, and not additionally in the parent market.

Should there be any questions concerning this information, please contact the undersigned.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David Oxenford', with a stylized flourish at the end.

David Oxenford

Counsel to Connoisseur Media, LLC

cc: Commissioner Brendan Carr
Nirali Patel, Esq.

Enclosure

Ranker Report Export from TAPSCAN Web												
Market:	HUDSON VALLEY										Listening by Home Market (Avg Share)	
Survey:	Nielsen Radio Spring 2017									Hudson Valley		13.9
Geography:	Metro									New York		57.6
Stations:	All Stations									Poughkeepsie		3.7
										Nassau-Suffolk		3.6
Age/Gender	Socioeconomic	Pop	Intab							Bridgeport		0.5
Persons 12+		1,518,500	2,330							Danbury		0.4
										Hartford		0.3
										Newburgh-Middletown		0.3
										Stamford-Norwalk		0.2
										Sussex	0.2	
	Station	Demo	Daypart	Average Persons	Weekly Cume Persons	Average Rating	Weekly Cume Rating	Average Share		Home Market	New Haven	0.1
1	WHUD-FM	Persons 12	M-Su 6a-12m	8,400	163,900	0.6	10.8	5		Hudson Valley	Other	-
2	WHTZ-FM	Persons 12	M-Su 6a-12m	6,900	246,900	0.5	16.3	4.1		New York		80.8
3	WBLS-FM	Persons 12	M-Su 6a-12m	6,700	110,700	0.4	7.3	4		New York		
4	WKTU-FM	Persons 12	M-Su 6a-12m	6,000	153,900	0.4	10.1	3.6		Nassau-Suffolk		
5t	WFAN-FM	Persons 12	M-Su 6a-12m	5,900	122,900	0.4	8.1	3.5		New York		
5t	WOR-AM	Persons 12	M-Su 6a-12m	5,900	88,000	0.4	5.8	3.5		New York		
7	WNYC-FM	Persons 12	M-Su 6a-12m	5,400	109,700	0.4	7.2	3.2		New York		
8t	WCBS-AM	Persons 12	M-Su 6a-12m	5,200	174,200	0.3	11.5	3.1		New York		
8t	WCBS-FM	Persons 12	M-Su 6a-12m	5,200	141,800	0.3	9.3	3.1		New York		
10	WSPK-FM	Persons 12	M-Su 6a-12m	5,100	126,300	0.3	8.3	3		Hudson Valley		
11	WQHT-FM	Persons 12	M-Su 6a-12m	4,900	144,100	0.3	9.5	2.9		New York		
12	WSKQ-FM	Persons 12	M-Su 6a-12m	4,700	71,600	0.3	4.7	2.8		New York		
13	WAXQ-FM	Persons 12	M-Su 6a-12m	4,600	124,900	0.3	8.2	2.7		New York		
14	WABC-AM	Persons 12	M-Su 6a-12m	4,400	89,300	0.3	5.9	2.6		New York		
15	WINS-AM	Persons 12	M-Su 6a-12m	3,900	141,400	0.3	9.3	2.3		New York		
16	WWPR-FM	Persons 12	M-Su 6a-12m	3,700	109,700	0.2	7.2	2.2		New York		
17t	WBMP-FM	Persons 12	M-Su 6a-12m	3,000	96,800	0.2	6.4	1.8		New York		
17t	WLTW-FM	Persons 12	M-Su 6a-12m	3,100	93,900	0.2	6.2	1.8		New York		
19t	WEPN-FM	Persons 12	M-Su 6a-12m	2,600	78,100	0.2	5.1	1.5		New York		
19t	WNSH-FM	Persons 12	M-Su 6a-12m	2,600	73,400	0.2	4.8	1.5		New York		

19t	WPDH-FM	Persons 12	M-Su 6a-12m	2,600	59,000	0.2	3.9	1.5		Poughkeepsie		
19t	WPLJ-FM	Persons 12	M-Su 6a-12m	2,500	96,200	0.2	6.3	1.5		New York		
19t	WXNY-FM	Persons 12	M-Su 6a-12m	2,600	45,700	0.2	3	1.5		New York		
24t	WPAT-FM	Persons 12	M-Su 6a-12m	2,400	36,700	0.2	2.4	1.4		New York		
24t	WQXR-FM	Persons 12	M-Su 6a-12m	2,400	64,500	0.2	4.2	1.4		New York		
24t	WXPB-FM	Persons 12	M-Su 6a-12m	2,400	50,100	0.2	3.3	1.4		Hudson Valley		
27	WFUV-FM	Persons 12	M-Su 6a-12m	1,800	56,000	0.1	3.7	1.1		New York		
28	WNEW-FM	Persons 12	M-Su 6a-12m	1,500	72,500	0.1	4.8	0.9		New York		
29	WNYC-AM	Persons 12	M-Su 6a-12m	1,300	21,600	0.1	1.4	0.8		New York		
30	WKLV-FM	Persons 12	M-Su 6a-12m	1,100	28,900	0.1	1.9	0.7		Hudson Valley		
31t	WBGO-FM	Persons 12	M-Su 6a-12m	1,000	27,800	0.1	1.8	0.6		New York		
31t	WNBM-FM	Persons 12	M-Su 6a-12m	1,000	32,300	0.1	2.1	0.6		Hudson Valley		
31t	WRPJ-FM	Persons 12	M-Su 6a-12m	1,000	8,000	0.1	0.5	0.6		Hudson Valley		
31t	WRRV-FM	Persons 12	M-Su 6a-12m	1,000	31,700	0.1	2.1	0.6		Hudson Valley		
31t	WRWD-FM	Persons 12	M-Su 6a-12m	1,000	16,600	0.1	1.1	0.6		Poughkeepsie		
36t	WLJP-FM	Persons 12	M-Su 6a-12m	900	12,700	0.1	0.8	0.5		Hudson Valley		
36t	WZAD-FM	Persons 12	M-Su 6a-12m	800	16,200	0.1	1.1	0.5		Hudson Valley		
38t	WAMK-FM	Persons 12	M-Su 6a-12m	600	11,400	0	0.8	0.4		Poughkeepsie		
38t	WEZN-FM	Persons 12	M-Su 6a-12m	700	15,500	0	1	0.4		Bridgeport		
38t	WRKI-FM	Persons 12	M-Su 6a-12m	600	23,100	0	1.5	0.4		Danbury		
41t	WALL-AM	Persons 12	M-Su 6a-12m	500	11,500	0	0.8	0.3		Hudson Valley		
41t	WBBR-AM	Persons 12	M-Su 6a-12m	500	23,900	0	1.6	0.3		New York		
41t	WDBY-FM	Persons 12	M-Su 6a-12m	500	12,500	0	0.8	0.3		New York		
41t	WLIB-AM	Persons 12	M-Su 6a-12m	500	10,300	0	0.7	0.3		New York		
45t	WBAI-FM	Persons 12	M-Su 6a-12m	400	12,700	0	0.8	0.2		New York		
45t	WCCC-FM	Persons 12	M-Su 6a-12m	300	5,200	0	0.3	0.2		Hartford		
45t	WDST-FM	Persons 12	M-Su 6a-12m	400	11,000	0	0.7	0.2		Poughkeepsie		
45t	WEBE-FM	Persons 12	M-Su 6a-12m	300	23,000	0	1.5	0.2		Stamford-Norwalk		
45t	WFDU-FM	Persons 12	M-Su 6a-12m	400	12,400	0	0.8	0.2		New York		
45t	WJGK-FM	Persons 12	M-Su 6a-12m	400	15,000	0	1	0.2		Hudson Valley		
45t	WJZZ-FM	Persons 12	M-Su 6a-12m	300	9,500	0	0.6	0.2		Newburgh-Middletown		
45t	WMCA-AM	Persons 12	M-Su 6a-12m	300	10,500	0	0.7	0.2		New York		
45t	WNYM-AM	Persons 12	M-Su 6a-12m	400	6,900	0	0.5	0.2		New York		
45t	WPKF-FM	Persons 12	M-Su 6a-12m	300	7,800	0	0.5	0.2		Poughkeepsie		

55t	WCZX-FM	Persons 12	M-Su 6a-12m	100	4,100	0	0.3	0.1		Poughkeepsie		
55t	WEOK-AM	Persons 12	M-Su 6a-12m	200	5,700	0	0.4	0.1		Poughkeepsie		
55t	WFME-FM	Persons 12	M-Su 6a-12m	100	3,700	0	0.2	0.1		Hudson Valley		
55t	WGNV-FM	Persons 12	M-Su 6a-12m	200	6,600	0	0.4	0.1		Poughkeepsie		
55t	WJUX-FM	Persons 12	M-Su 6a-12m	200	6,000	0	0.4	0.1		Poughkeepsie		
55t	WKCI-FM	Persons 12	M-Su 6a-12m	200	4,600	0	0.3	0.1		New Haven		
55t	WKCR-FM	Persons 12	M-Su 6a-12m	100	7,500	0	0.5	0.1		New York		
55t	WKXP-FM	Persons 12	M-Su 6a-12m	100	1,900	0	0.1	0.1		Poughkeepsie		
55t	WNNJ-FM	Persons 12	M-Su 6a-12m	200	8,300	0	0.5	0.1		Sussex		
55t	WNPR-FM	Persons 12	M-Su 6a-12m	100	4,700	0	0.3	0.1		Hartford		
55t	WOSR-FM	Persons 12	M-Su 6a-12m	200	7,000	0	0.5	0.1		Hudson Valley		
55t	WQXW-FM	Persons 12	M-Su 6a-12m	200	3,700	0	0.2	0.1		Hudson Valley		
55t	WRHV-FM	Persons 12	M-Su 6a-12m	100	1,200	0	0.1	0.1		Poughkeepsie		
55t	WRNQ-FM	Persons 12	M-Su 6a-12m	100	3,900	0	0.3	0.1		Poughkeepsie		
55t	WRWB-FM	Persons 12	M-Su 6a-12m	100	4,200	0	0.3	0.1		Newburgh-Middletown		
55t	WSHU-FM	Persons 12	M-Su 6a-12m	100	5,000	0	0.3	0.1		Bridgeport		
55t	WSUL-FM	Persons 12	M-Su 6a-12m	100	1,600	0	0.1	0.1		Hudson Valley		
55t	WSUS-FM	Persons 12	M-Su 6a-12m	200	3,200	0	0.2	0.1		Sussex		
55t	WVIP-FM	Persons 12	M-Su 6a-12m	200	7,000	0	0.5	0.1		Hudson Valley		
55t	WVKR-FM	Persons 12	M-Su 6a-12m	100	3,800	0	0.3	0.1		Poughkeepsie		
	Analysis Total	Persons 12	M-Su 6a-12m					80.8				
Additional Notices:												
Estimates reported for dayparts which start and end between 12m and 5a are based on the 5a-5a broadcast day. Estimates for all other dayparts are based on the 12m-12m calendar day.												
Please note: The intab reported is for the full twelve weeks of the survey. Users should note that reports run on fewer than twelve weeks are based on smaller sample sizes.												

Stations qualify to be reported if they have received credit for five or more minutes of listening in at least 10 in-tab diaries in the survey area, Monday-Sunday Midnight-Midnight, during the survey period.												
Estimates are derived from the diaries that provided the audience data for the Nielsen Radio Market Report and are subject to the qualifications and limitations stated in that Report. The TAPSCAN Web software product is accredited by the Media Rating Council and reports both accredited and non-accredited data. For a list of the accredited and non-accredited Nielsen radio markets and data available through TAPSCAN, click here: http://www.arbitron.com/downloads/MRC_Accredited_Services_Markets.pdf												
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Ranker Report Export from TAPSCAN Web													
Market:	POUGHKEEPSIE, NY										Listening by Home Market (Avg Share)		
Survey:	Average of Nielsen Radio Spring 2017, Nielsen Radio Fall 2016											Poughkeepsie	42.6
Geography:	Metro											Hudson Valley	16.2
Stations:	All Stations											New York	14.9
												Albany-Schenectady-Troy	1.0
Age/Gender	Socioeconomic	Pop	Intab									Danbury	1.0
Persons 12+		259,500	1,678									Newburgh-Middletown	0.7
												Bridgeport	0.6
												Hartford	0.3
												New Haven	0.3
											Other	2.3	
	Station	Demo	Daypart	Average Persons	Weekly Cume Persons	Average Rating	Weekly Cume Rating	Average Share		Home Market	79.9		
1	WSPK-FM	Persons 12	M-Su 6a-12m	2,600	65,400	1	25.2	9		Hudson Valley			
2	WPDH-FM	Persons 12	M-Su 6a-12m	2,300	43,700	0.9	16.8	7.9		Poughkeepsie			
3	WRWD-FM	Persons 12	M-Su 6a-12m	1,300	27,100	0.5	10.4	4.5		Poughkeepsie			
4	WPKF-FM	Persons 12	M-Su 6a-12m	1,200	30,000	0.5	11.6	4.1		Poughkeepsie			
5	WHUD-FM	Persons 12	M-Su 6a-12m	1,100	22,200	0.4	8.6	3.8		Hudson Valley			
6t	WAMK-FM	Persons 12	M-Su 6a-12m	1,000	17,100	0.4	6.6	3.4		Poughkeepsie			
6t	WRNQ-FM	Persons 12	M-Su 6a-12m	1,000	25,300	0.4	9.7	3.4		Poughkeepsie			
8	WGNV-FM	Persons 12	M-Su 6a-12m	900	16,000	0.3	6.2	3.1		Poughkeepsie			
9t	WFAN-FM	Persons 12	M-Su 6a-12m	800	14,200	0.3	5.5	2.8		New York			
9t	WKIP-AM	Persons 12	M-Su 6a-12m	800	9,600	0.3	3.7	2.8		Poughkeepsie			
11t	WCZX-FM	Persons 12	M-Su 6a-12m	700	20,900	0.3	8.1	2.4		Poughkeepsie			
11t	WRRV-FM	Persons 12	M-Su 6a-12m	700	22,600	0.3	8.7	2.4		Hudson Valley			
13t	WDST-FM	Persons 12	M-Su 6a-12m	600	14,100	0.2	5.4	2.1		Poughkeepsie			
13t	WKXP-FM	Persons 12	M-Su 6a-12m	600	15,000	0.2	5.8	2.1		Poughkeepsie			
15	WBPM-FM	Persons 12	M-Su 6a-12m	500	10,300	0.2	4	1.7		Poughkeepsie			
16t	WABC-AM	Persons 12	M-Su 6a-12m	400	8,600	0.2	3.3	1.4		New York			
16t	WBWZ-FM	Persons 12	M-Su 6a-12m	400	12,800	0.2	4.9	1.4		Poughkeepsie			
16t	WCBS-AM	Persons 12	M-Su 6a-12m	400	12,500	0.2	4.8	1.4		New York			
19t	WDBY-FM	Persons 12	M-Su 6a-12m	300	8,100	0.1	3.1	1		New York			
19t	WEPN-FM	Persons 12	M-Su 6a-12m	300	5,100	0.1	2	1		New York			
19t	WOR-AM	Persons 12	M-Su 6a-12m	300	7,000	0.1	2.7	1		New York			

19t	WQQQ-FM	Persons 12	M-Su 6a-12m	300	7,300	0.1	2.8	1				
23t	WAMC-FM	Persons 12	M-Su 6a-12m	200	4,100	0.1	1.6	0.7				
23t	WBLS-FM	Persons 12	M-Su 6a-12m	200	3,900	0.1	1.5	0.7		New York		
23t	WFGB-FM	Persons 12	M-Su 6a-12m	200	5,700	0.1	2.2	0.7		Poughkeepsie		
23t	WHTZ-FM	Persons 12	M-Su 6a-12m	200	6,300	0.1	2.4	0.7		New York		
23t	WHVW-AM	Persons 12	M-Su 6a-12m	200	1,500	0.1	0.6	0.7		Poughkeepsie		
23t	WJGK-FM	Persons 12	M-Su 6a-12m	200	4,800	0.1	1.8	0.7		Hudson Valley		
23t	WJZZ-FM	Persons 12	M-Su 6a-12m	200	5,400	0.1	2.1	0.7		Newburgh-Middletown		
23t	WKZE-FM	Persons 12	M-Su 6a-12m	200	4,900	0.1	1.9	0.7		Poughkeepsie		
23t	WMHT-FM	Persons 12	M-Su 6a-12m	200	4,800	0.1	1.8	0.7		Albany-Schenectady-Troy		
23t	WNYC-FM	Persons 12	M-Su 6a-12m	200	4,800	0.1	1.8	0.7		New York		
23t	WQHT-FM	Persons 12	M-Su 6a-12m	200	5,200	0.1	2	0.7		New York		
23t	WRHV-FM	Persons 12	M-Su 6a-12m	200	6,900	0.1	2.7	0.7		Poughkeepsie		
23t	WRKI-FM	Persons 12	M-Su 6a-12m	200	5,800	0.1	2.2	0.7		Danbury		
23t	WSKQ-FM	Persons 12	M-Su 6a-12m	200	2,500	0.1	1	0.7		New York		
23t	WXNY-FM	Persons 12	M-Su 6a-12m	200	1,200	0.1	0.5	0.7		New York		
38t	WALL-AM	Persons 12	M-Su 6a-12m	100	1,800	0	0.7	0.3		Hudson Valley		
38t	WAXQ-FM	Persons 12	M-Su 6a-12m	100	3,300	0	1.3	0.3		New York		
38t	WCBS-FM	Persons 12	M-Su 6a-12m	100	3,200	0	1.2	0.3		New York		
38t	WCCC-FM	Persons 12	M-Su 6a-12m	100	2,100	0	0.8	0.3		Hartford		
38t	WDAQ-FM	Persons 12	M-Su 6a-12m	100	2,200	0	0.8	0.3		Danbury		
38t	WEOK-AM	Persons 12	M-Su 6a-12m	100	2,100	0	0.8	0.3		Poughkeepsie		
38t	WEZN-FM	Persons 12	M-Su 6a-12m	100	2,000	0	0.8	0.3		Bridgeport		
38t	WFSO-FM	Persons 12	M-Su 6a-12m	100	1,900	0	0.7	0.3				
38t	WFUV-FM	Persons 12	M-Su 6a-12m	100	2,100	0	0.8	0.3		New York		
38t	WJUX-FM	Persons 12	M-Su 6a-12m	100	2,100	0	0.8	0.3		Poughkeepsie		
38t	WKNY-AM	Persons 12	M-Su 6a-12m	100	700	0	0.3	0.3				
38t	WLTW-FM	Persons 12	M-Su 6a-12m	100	2,500	0	1	0.3		New York		
38t	WNSH-FM	Persons 12	M-Su 6a-12m	100	1,700	0	0.7	0.3		New York		
38t	WPLR-FM	Persons 12	M-Su 6a-12m	100	1,000	0	0.4	0.3		New Haven		
38t	WQXR-FM	Persons 12	M-Su 6a-12m	100	2,600	0	1	0.3		New York		
38t	WROW-AM	Persons 12	M-Su 6a-12m	100	1,300	0	0.5	0.3		Albany-Schenectady-Troy		
38t	WSHU-FM	Persons 12	M-Su 6a-12m	100	1,600	0	0.6	0.3		Bridgeport		
38t	WVKR-FM	Persons 12	M-Su 6a-12m	100	4,500	0	1.7	0.3		Poughkeepsie		
38t	WWPR-FM	Persons 12	M-Su 6a-12m	100	3,000	0	1.2	0.3		New York		

	Analysis Total	Persons 12	M-Su 6a-12m						79.9				
Additional Notices:													
Estimates reported for dayparts which start and end between 12m and 5a are based on the 5a-5a broadcast day. Estimates for all other dayparts are based on the 12m-12m calendar day.													
Please note: The intab reported is for the full twelve weeks of the survey. Users should note that reports run on fewer than twelve weeks are based on smaller sample sizes.													
Stations qualify to be reported if they have received credit for five or more minutes of listening in at least 1 in-tab diaries in the survey area, Monday-Sunday Midnight-Midnight, during the survey period.													
Estimates are derived from the diaries that provided the audience data for the Nielsen Radio Market Report and are subject to the qualifications and limitations stated in that Report. The TAPSCAN Web software product is accredited by the Media Rating Council and reports both accredited and non-accredited data. For a list of the accredited and non-accredited Nielsen radio markets and data available through TAPSCAN, click here: http://www.arbitron.com/downloads/MRC_Accredited_Services_Markets.pdf													
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Ranker Report Export from TAPSCAN Web												
Market:	TRENTON										Listening by Home Market (Avg Share)	
Survey:	Nielsen Radio Spring 2017											
Geography:	Metro											
Stations:	All Stations											
Age/Gender	Socioeconomic	Pop	Intab									
Persons 12+		320,200	864								Other	
											77.7	
	Station	Demo	Daypart	Average Persons	Weekly Cume Persons	Average Rating	Weekly Cume Rating	Average Share		Home Market		
1	WDAS-FM	Persons 12+	M-Su 6a-12m	2,900	33,300	0.9	10.4	9.1		Philadelphia		
2	WKXW-FM	Persons 12+	M-Su 6a-12m	2,100	52,400	0.7	16.4	6.6		Middlesex-Somerset-Union		
3	WPST-FM	Persons 12+	M-Su 6a-12m	1,900	67,900	0.6	21.2	6		Trenton		
4	WUSL-FM	Persons 12+	M-Su 6a-12m	1,600	29,000	0.5	9.1	5		Philadelphia		
5	WMMR-FM	Persons 12+	M-Su 6a-12m	1,400	30,000	0.4	9.4	4.4		Philadelphia		
6	WOGL-FM	Persons 12+	M-Su 6a-12m	1,300	32,400	0.4	10.1	4.1		Philadelphia		
7	WRFF-FM	Persons 12+	M-Su 6a-12m	1,000	34,000	0.3	10.6	3.2		Philadelphia		
8t	WHYY-FM	Persons 12+	M-Su 6a-12m	900	24,400	0.3	7.6	2.8		Philadelphia		
8t	WTDY-FM	Persons 12+	M-Su 6a-12m	900	35,000	0.3	10.9	2.8		Philadelphia		
8t	WXTU-FM	Persons 12+	M-Su 6a-12m	900	26,500	0.3	8.3	2.8		Philadelphia		
11t	WIMG-AM	Persons 12+	M-Su 6a-12m	800	5,700	0.2	1.8	2.5		Trenton		
11t	WRTI-FM	Persons 12+	M-Su 6a-12m	800	13,900	0.2	4.3	2.5		Philadelphia		
13	WNYC-FM	Persons 12+	M-Su 6a-12m	700	10,500	0.2	3.3	2.2		New York		
14t	WBEN-FM	Persons 12+	M-Su 6a-12m	500	23,900	0.2	7.5	1.6		Philadelphia		
14t	WMGK-FM	Persons 12+	M-Su 6a-12m	500	15,800	0.2	4.9	1.6		Philadelphia		
14t	WPEN-FM	Persons 12+	M-Su 6a-12m	500	13,300	0.2	4.2	1.6		Philadelphia		
17t	WFAN-FM	Persons 12+	M-Su 6a-12m	400	11,300	0.1	3.5	1.3		New York		
17t	WIOQ-FM	Persons 12+	M-Su 6a-12m	400	21,100	0.1	6.6	1.3		Philadelphia		
17t	WWPH-FM	Persons 12+	M-Su 6a-12m	400	7,400	0.1	2.3	1.3		Trenton		
20t	WAWZ-FM	Persons 12+	M-Su 6a-12m	300	11,500	0.1	3.6	0.9		Middlesex-Somerset-Union		
20t	WPAT-FM	Persons 12+	M-Su 6a-12m	300	6,600	0.1	2.1	0.9		New York		
20t	WQHT-FM	Persons 12+	M-Su 6a-12m	300	13,200	0.1	4.1	0.9		New York		
20t	WSKQ-FM	Persons 12+	M-Su 6a-12m	300	6,400	0.1	2	0.9		New York		

20t	WWPR-FM	Persons 12+	M-Su 6a-12m	300	5,800	0.1	1.8	0.9		New York		
20t	WXPB-FM	Persons 12+	M-Su 6a-12m	300	10,500	0.1	3.3	0.9		Philadelphia		
26t	WBLS-FM	Persons 12+	M-Su 6a-12m	200	5,900	0.1	1.8	0.6		New York		
26t	WCBS-AM	Persons 12+	M-Su 6a-12m	200	7,900	0.1	2.5	0.6		New York		
26t	WHTZ-FM	Persons 12+	M-Su 6a-12m	200	6,400	0.1	2	0.6		New York		
26t	WISX-FM	Persons 12+	M-Su 6a-12m	200	11,300	0.1	3.5	0.6		Philadelphia		
26t	WKVP-FM	Persons 12+	M-Su 6a-12m	200	7,600	0.1	2.4	0.6		Philadelphia		
26t	WLTW-FM	Persons 12+	M-Su 6a-12m	200	5,800	0.1	1.8	0.6		New York		
26t	WMGQ-FM	Persons 12+	M-Su 6a-12m	200	5,700	0.1	1.8	0.6		Middlesex-Somerset-Union		
26t	WNJT-FM	Persons 12+	M-Su 6a-12m	200	10,000	0.1	3.1	0.6		Trenton		
26t	WOR-AM	Persons 12+	M-Su 6a-12m	200	6,600	0.1	2.1	0.6		New York		
26t	WWFM-FM	Persons 12+	M-Su 6a-12m	200	9,200	0.1	2.9	0.6		Trenton		
36t	WABC-AM	Persons 12+	M-Su 6a-12m	100	4,300	0	1.3	0.3		New York		
36t	WAXQ-FM	Persons 12+	M-Su 6a-12m	100	4,200	0	1.3	0.3		New York		
36t	WBEB-FM	Persons 12+	M-Su 6a-12m	100	4,200	0	1.3	0.3		Philadelphia		
36t	WBMP-FM	Persons 12+	M-Su 6a-12m	100	3,600	0	1.1	0.3		New York		
36t	WEPN-FM	Persons 12+	M-Su 6a-12m	100	4,800	0	1.5	0.3		New York		
36t	WIP-FM	Persons 12+	M-Su 6a-12m	100	6,200	0	1.9	0.3		Philadelphia		
36t	WKTU-FM	Persons 12+	M-Su 6a-12m	100	4,200	0	1.3	0.3		Nassau-Suffolk		
36t	WNEW-FM	Persons 12+	M-Su 6a-12m	100	4,000	0	1.2	0.3		New York		
36t	WNSH-FM	Persons 12+	M-Su 6a-12m	100	5,000	0	1.6	0.3		New York		
36t	WNYC-AM	Persons 12+	M-Su 6a-12m	100	2,900	0	0.9	0.3		New York		
36t	WPLJ-FM	Persons 12+	M-Su 6a-12m	100	6,300	0	2	0.3		New York		
36t	WRNB-FM	Persons 12+	M-Su 6a-12m	100	3,400	0	1.1	0.3		Philadelphia		
	Analysis Total	Persons 12+	M-Su 6a-12m					77.7				
Additional Notices:												
Estimates reported for dayparts which start and end between 12m and 5a are based on the 5a-5a broadcast day. Estimates for all other dayparts are based on the 12m-12m calendar day.												
Please note: The intab reported is for the full twelve weeks of the survey. Users should note that reports run on fewer than twelve weeks are based on smaller sample sizes.												

Stations qualify to be reported if they have received credit for five or more minutes of listening in at least 10 in-tab diaries in the survey area, Monday-Sunday Midnight-Midnight, during the survey period.												
Estimates are derived from the diaries that provided the audience data for the Nielsen Radio Market Report and are subject to the qualifications and limitations stated in that Report. The TAPSCAN Web software product is accredited by the Media Rating Council and reports both accredited and non-accredited data. For a list of the accredited and non-accredited Nielsen radio markets and data available through TAPSCAN, click here: http://www.arbitron.com/downloads/MRC_Accredited_Services_Markets.pdf												
Ascription Website:												
http://ascription.nielsen.com												
Rating Reliability Estimator												
https://rre.nielsen.com												
A Nielsen Radio eBook Special Notices and Station Activities document has been generated for each survey. Please select the hyperlink to the survey that interests you.												
https://ebook.nielsen.com/secure/RR8/2017SPR/0537/pdfs/SpecialNotices.pdf												
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Ranker Report Export from TAPSCAN Web														
Market:	BRIDGEPORT											Listening by Home Market (Avg Share)		
Survey:	Nielsen Radio Spring 2017												Bridgeport	20.4
Geography:	Metro												New York	22.2
Stations:	All Stations												New Haven	15.2
													Stamford-Norwalk	12.6
Age/Gender	Socioeconomic	Pop	Intab										Hartford	7.8
Persons 12+		422,600	1,373										Nassau-Suffolk	4.4
													Danbury	1.6
													Hudson Valley	0.4
													Other	-
													84.6	
	Station	Demo	Daypart	Average Persons	Weekly Cume Persons	Average Rating	Weekly Cume Rating	Average Share		Home Market				
1	WEBE-FM	Persons 12+	M-Su 6a-12m	6,300	100,400	1.5	23.8	12.6		Stamford-Norwalk				
2	WEZN-FM	Persons 12+	M-Su 6a-12m	4,300	89,500	1	21.2	8.6		Bridgeport				
3	WPLR-FM	Persons 12+	M-Su 6a-12m	4,200	71,500	1	16.9	8.4		New Haven				
4	WICC-AM	Persons 12+	M-Su 6a-12m	3,000	51,700	0.7	12.2	6		Bridgeport				
5	WKCI-FM	Persons 12+	M-Su 6a-12m	2,500	55,400	0.6	13.1	5		New Haven				
6t	WQHT-FM	Persons 12+	M-Su 6a-12m	1,800	41,400	0.4	9.8	3.6		New York				
6t	WSHU-FM	Persons 12+	M-Su 6a-12m	1,800	32,700	0.4	7.7	3.6		Bridgeport				
8	WFAN-FM	Persons 12+	M-Su 6a-12m	1,500	36,400	0.4	8.6	3		New York				
9	WCBS-AM	Persons 12+	M-Su 6a-12m	1,400	34,400	0.3	8.1	2.8		New York				
10	WBLS-FM	Persons 12+	M-Su 6a-12m	1,300	17,700	0.3	4.2	2.6		New York				
11	WZMX-FM	Persons 12+	M-Su 6a-12m	1,200	29,000	0.3	6.9	2.4		Hartford				
12t	WSKQ-FM	Persons 12+	M-Su 6a-12m	1,000	19,400	0.2	4.6	2		New York				
12t	WWYZ-FM	Persons 12+	M-Su 6a-12m	1,000	23,000	0.2	5.4	2		Hartford				
14	WKTU-FM	Persons 12+	M-Su 6a-12m	900	23,200	0.2	5.5	1.8		Nassau-Suffolk				
15t	WELI-AM	Persons 12+	M-Su 6a-12m	600	11,400	0.1	2.7	1.2		New Haven				
15t	WFOX-FM	Persons 12+	M-Su 6a-12m	600	18,200	0.1	4.3	1.2		Bridgeport				
15t	WHTZ-FM	Persons 12+	M-Su 6a-12m	600	24,500	0.1	5.8	1.2		New York				
18t	WABC-AM	Persons 12+	M-Su 6a-12m	500	10,600	0.1	2.5	1		New York				
18t	WALK-FM	Persons 12+	M-Su 6a-12m	500	12,500	0.1	3	1		Nassau-Suffolk				
18t	WNYC-FM	Persons 12+	M-Su 6a-12m	500	8,600	0.1	2	1		New York				
18t	WRKI-FM	Persons 12+	M-Su 6a-12m	500	17,200	0.1	4.1	1		Danbury				
18t	WWPR-FM	Persons 12+	M-Su 6a-12m	500	18,200	0.1	4.3	1		New York				

23t	WNPR-FM	Persons 12+	M-Su 6a-12m	400	9,600	0.1	2.3	0.8		Hartford		
23t	WSUF-FM	Persons 12+	M-Su 6a-12m	400	7,900	0.1	1.9	0.8		Nassau-Suffolk		
25t	WCUM-AM	Persons 12+	M-Su 6a-12m	300	3,600	0.1	0.9	0.6		Bridgeport		
25t	WEPN-FM	Persons 12+	M-Su 6a-12m	300	5,700	0.1	1.3	0.6		New York		
25t	WFUV-FM	Persons 12+	M-Su 6a-12m	300	6,200	0.1	1.5	0.6		New York		
25t	WHCN-FM	Persons 12+	M-Su 6a-12m	300	8,200	0.1	1.9	0.6		Hartford		
25t	WMNR-FM	Persons 12+	M-Su 6a-12m	300	6,300	0.1	1.5	0.6		Danbury		
25t	WMRQ-FM	Persons 12+	M-Su 6a-12m	300	16,400	0.1	3.9	0.6		Hartford		
25t	WOR-AM	Persons 12+	M-Su 6a-12m	300	11,300	0.1	2.7	0.6		New York		
25t	WYBC-FM	Persons 12+	M-Su 6a-12m	300	8,700	0.1	2.1	0.6		New Haven		
33t	WBLI-FM	Persons 12+	M-Su 6a-12m	200	13,800	0	3.3	0.4		Nassau-Suffolk		
33t	WCCC-FM	Persons 12+	M-Su 6a-12m	200	5,900	0	1.4	0.4		Hartford		
33t	WDRC-FM	Persons 12+	M-Su 6a-12m	200	7,200	0	1.7	0.4		Hartford		
33t	WINS-AM	Persons 12+	M-Su 6a-12m	200	10,400	0	2.5	0.4		New York		
33t	WKLV-FM	Persons 12+	M-Su 6a-12m	200	3,800	0	0.9	0.4		Hudson Valley		
33t	WKSS-FM	Persons 12+	M-Su 6a-12m	200	8,700	0	2.1	0.4		Hartford		
33t	WPAT-FM	Persons 12+	M-Su 6a-12m	200	7,500	0	1.8	0.4		New York		
33t	WPKN-FM	Persons 12+	M-Su 6a-12m	200	8,200	0	1.9	0.4		Bridgeport		
33t	WXNY-FM	Persons 12+	M-Su 6a-12m	200	4,700	0	1.1	0.4		New York		
42t	WAXQ-FM	Persons 12+	M-Su 6a-12m	100	2,500	0	0.6	0.2		New York		
42t	WBMP-FM	Persons 12+	M-Su 6a-12m	100	4,400	0	1	0.2		New York		
42t	WBON-FM	Persons 12+	M-Su 6a-12m	100	4,600	0	1.1	0.2		Nassau-Suffolk		
42t	WCBS-FM	Persons 12+	M-Su 6a-12m	100	4,300	0	1	0.2		New York		
42t	WEHM-FM	Persons 12+	M-Su 6a-12m	100	3,000	0	0.7	0.2		Nassau-Suffolk		
42t	WLTW-FM	Persons 12+	M-Su 6a-12m	100	2,800	0	0.7	0.2		New York		
42t	WPLJ-FM	Persons 12+	M-Su 6a-12m	100	7,500	0	1.8	0.2		New York		
42t	WTIC-AM	Persons 12+	M-Su 6a-12m	100	3,900	0	0.9	0.2		Hartford		
	Analysis Total	Persons 12+	M-Su 6a-12m					84.6				
Additional Notices:												
Estimates reported for dayparts which start and end between 12m and 5a are based on the 5a-5a broadcast day. Estimates for all other dayparts are based on the 12m-12m calendar day.												

Please note: The intab reported is for the full twelve weeks of the survey. Users should note that reports run on fewer than twelve weeks are based on smaller sample sizes.												
Stations qualify to be reported if they have received credit for five or more minutes of listening in at least 10 in-tab diaries in the survey area, Monday-Sunday Midnight-Midnight, during the survey period.												
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Ranker Report Export from TAPSCAN Web													
Market:	STAMFORD-NORWALK, CT										Listening by Home Market (Avg Share)		
Survey:	Average of Nielsen Radio Spring 2017, Nielsen Radio Fall 2016											Stamford-Norwalk	8.2
Geography:	Metro											New York	51.4
Stations:	All Stations											Bridgeport	10.8
												Nassau-Suffolk	5.4
Age/Gender	Socioeconomic	Pop	Intab									Hartford	3.4
Persons 12+		324,800	1,393									Hudson Valley	1.6
												New Haven	1.5
												Danbury	0.6
												Detroit	0.3
											Other	0.3	
	Station	Demo	Daypart	Average Persons	Weekly Cume Persons	Average Rating	Weekly Cume Rating	Average Share		Home Market	83.5		
1	WEBE-FM	Persons 12+	M-Su 6a-12m	2,200	48,200	0.7	14.8	7		Stamford-Norwalk			
2	WCBS-AM	Persons 12+	M-Su 6a-12m	1,700	38,900	0.5	12	5.4		New York			
3	WHTZ-FM	Persons 12+	M-Su 6a-12m	1,600	55,600	0.5	17.1	5.1		New York			
4	WEZN-FM	Persons 12+	M-Su 6a-12m	1,300	43,300	0.4	13.3	4.1		Bridgeport			
5t	WFAN-FM	Persons 12+	M-Su 6a-12m	1,200	31,400	0.4	9.7	3.8		New York			
5t	WNYC-FM	Persons 12+	M-Su 6a-12m	1,200	23,500	0.4	7.2	3.8		New York			
7t	WBLS-FM	Persons 12+	M-Su 6a-12m	1,000	13,300	0.3	4.1	3.2		New York			
7t	WFOX-FM	Persons 12+	M-Su 6a-12m	1,000	31,600	0.3	9.7	3.2		Bridgeport			
9t	WNPR-FM	Persons 12+	M-Su 6a-12m	800	14,800	0.2	4.6	2.5		Hartford			
9t	WQHT-FM	Persons 12+	M-Su 6a-12m	800	24,400	0.2	7.5	2.5		New York			
9t	WSHU-FM	Persons 12+	M-Su 6a-12m	800	14,800	0.2	4.6	2.5		Bridgeport			
9t	WSKQ-FM	Persons 12+	M-Su 6a-12m	800	14,400	0.2	4.4	2.5		New York			
13t	WCBS-FM	Persons 12+	M-Su 6a-12m	700	17,300	0.2	5.3	2.2		New York			
13t	WOR-AM	Persons 12+	M-Su 6a-12m	700	12,300	0.2	3.8	2.2		New York			
15	WKTU-FM	Persons 12+	M-Su 6a-12m	600	26,800	0.2	8.3	1.9		Nassau-Suffolk			
16t	WBMP-FM	Persons 12+	M-Su 6a-12m	500	24,400	0.2	7.5	1.6		New York			
16t	WFUV-FM	Persons 12+	M-Su 6a-12m	500	14,200	0.2	4.4	1.6		New York			
16t	WPAT-FM	Persons 12+	M-Su 6a-12m	500	7,700	0.2	2.4	1.6		New York			
16t	WQXR-FM	Persons 12+	M-Su 6a-12m	500	6,600	0.2	2	1.6		New York			
16t	WWPR-FM	Persons 12+	M-Su 6a-12m	500	17,900	0.2	5.5	1.6		New York			
21t	WABC-AM	Persons 12+	M-Su 6a-12m	400	10,600	0.1	3.3	1.3		New York			
21t	WAXQ-FM	Persons 12+	M-Su 6a-12m	400	14,800	0.1	4.6	1.3		New York			
21t	WINS-AM	Persons 12+	M-Su 6a-12m	400	18,500	0.1	5.7	1.3		New York			

21t	WPLJ-FM	Persons 12+	M-Su 6a-12m	400	21,400	0.1	6.6	1.3		New York			
21t	WXNY-FM	Persons 12+	M-Su 6a-12m	400	8,100	0.1	2.5	1.3		New York			
26t	WBBR-AM	Persons 12+	M-Su 6a-12m	300	5,200	0.1	1.6	1		New York			
26t	WBLI-FM	Persons 12+	M-Su 6a-12m	300	16,400	0.1	5	1		Nassau-Suffolk			
26t	WEPN-FM	Persons 12+	M-Su 6a-12m	300	13,000	0.1	4	1		New York			
26t	WICC-AM	Persons 12+	M-Su 6a-12m	300	8,700	0.1	2.7	1		Bridgeport			
26t	WKLV-FM	Persons 12+	M-Su 6a-12m	300	10,800	0.1	3.3	1		Hudson Valley			
26t	WLTW-FM	Persons 12+	M-Su 6a-12m	300	13,000	0.1	4	1		New York			
26t	WNEW-FM	Persons 12+	M-Su 6a-12m	300	15,400	0.1	4.7	1		New York			
26t	WNSH-FM	Persons 12+	M-Su 6a-12m	300	8,800	0.1	2.7	1		New York			
26t	WQBU-FM	Persons 12+	M-Su 6a-12m	300	2,600	0.1	0.8	1		Nassau-Suffolk			
35t	WPLR-FM	Persons 12+	M-Su 6a-12m	200	10,100	0.1	3.1	0.6		New Haven			
35t	WSUF-FM	Persons 12+	M-Su 6a-12m	200	6,100	0.1	1.9	0.6		Nassau-Suffolk			
35t	WZMX-FM	Persons 12+	M-Su 6a-12m	200	5,000	0.1	1.5	0.6		Hartford			
38t	WALK-FM	Persons 12+	M-Su 6a-12m	100	4,500	0	1.4	0.3		Nassau-Suffolk			
38t	WBAI-FM	Persons 12+	M-Su 6a-12m	100	5,200	0	1.6	0.3		New York			
38t	WFUV-FM Stream	Persons 12+	M-Su 6a-12m	100	1,300	0	0.4	0.3		New York			
38t	WGCH-AM	Persons 12+	M-Su 6a-12m	100	4,200	0	1.3	0.3		Stamford-Norwalk			
38t	WGRS-FM	Persons 12+	M-Su 6a-12m	100	1,500	0	0.5	0.3		New Haven			
38t	WHLI-AM	Persons 12+	M-Su 6a-12m	100	2,500	0	0.8	0.3		Nassau-Suffolk			
38t	WKCI-FM	Persons 12+	M-Su 6a-12m	100	7,900	0	2.4	0.3		New Haven			
38t	WMCA-AM	Persons 12+	M-Su 6a-12m	100	300	0	0.1	0.3		New York			
38t	WMNR-FM	Persons 12+	M-Su 6a-12m	100	1,900	0	0.6	0.3		Danbury			
38t	WNLK-AM	Persons 12+	M-Su 6a-12m	100	300	0	0.1	0.3		Stamford-Norwalk			
38t	WNYE-FM	Persons 12+	M-Su 6a-12m	100	1,500	0	0.5	0.3		New York			
38t	WNYH-AM	Persons 12+	M-Su 6a-12m	100	1,100	0	0.3	0.3		Nassau-Suffolk			
38t	WRKI-FM	Persons 12+	M-Su 6a-12m	100	3,500	0	1.1	0.3		Danbury			
38t	WRVP-AM	Persons 12+	M-Su 6a-12m	100	1,100	0	0.3	0.3		Hudson Valley			
38t	WSHU-AM	Persons 12+	M-Su 6a-12m	100	3,200	0	1	0.3		New Haven			
38t	WSTC-AM	Persons 12+	M-Su 6a-12m	100	2,600	0	0.8	0.3		Stamford-Norwalk			
38t	WWPT-FM	Persons 12+	M-Su 6a-12m	100	4,700	0	1.4	0.3		Stamford-Norwalk			
38t	WWYZ-FM	Persons 12+	M-Su 6a-12m	100	2,400	0	0.7	0.3		Hartford			
38t	WXPB-FM	Persons 12+	M-Su 6a-12m	100	5,900	0	1.8	0.3		Hudson Valley			
38t	WXYT-FM Stream	Persons 12+	M-Su 6a-12m	100	300	0	0.1	0.3		Detroit			
38t	WZBG-FM	Persons 12+	M-Su 6a-12m	100	1,400	0	0.4	0.3					
	Analysis Total	Persons 12+	M-Su 6a-12m					83.5					

Additional Notices:													
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21t	WMRQ-FM	Persons 12+	M-Su 6a-12m	600	22,800	0.1	4.1	1		Hartford		
21t	WNNZ-AM	Persons 12+	M-Su 6a-12m	600	17,300	0.1	3.1	1		Springfield		
21t	WRSI-FM	Persons 12+	M-Su 6a-12m	600	20,300	0.1	3.7	1		Springfield		
21t	WSPR-AM	Persons 12+	M-Su 6a-12m	600	9,600	0.1	1.7	1		Springfield		
21t	WWYZ-FM	Persons 12+	M-Su 6a-12m	600	20,700	0.1	3.7	1		Hartford		
29	WAIC-FM	Persons 12+	M-Su 6a-12m	500	9,600	0.1	1.7	0.8		Springfield		
30	WLHZ-FM	Persons 12+	M-Su 6a-12m	400	4,800	0.1	0.9	0.6		Springfield		
31t	WHMP-AM	Persons 12+	M-Su 6a-12m	300	8,700	0.1	1.6	0.5		Springfield		
31t	WKCI-FM	Persons 12+	M-Su 6a-12m	300	17,000	0.1	3.1	0.5		New Haven		
31t	WTIC-AM	Persons 12+	M-Su 6a-12m	300	6,200	0.1	1.1	0.5		Hartford		
34t	WAMH-FM	Persons 12+	M-Su 6a-12m	200	6,700	0	1.2	0.3		Springfield		
34t	WBUR-FM	Persons 12+	M-Su 6a-12m	200	5,800	0	1	0.3		Boston		
34t	WCCH-FM	Persons 12+	M-Su 6a-12m	200	1,600	0	0.3	0.3		Springfield		
34t	WGBH-FM	Persons 12+	M-Su 6a-12m	200	4,200	0	0.8	0.3		Boston		
34t	WMUA-FM	Persons 12+	M-Su 6a-12m	200	8,200	0	1.5	0.3		Springfield		
34t	WPVQ-FM	Persons 12+	M-Su 6a-12m	200	7,100	0	1.3	0.3		Springfield		
40t	WAAF-FM	Persons 12+	M-Su 6a-12m	100	7,100	0	1.3	0.2		Boston		
40t	WACE-AM	Persons 12+	M-Su 6a-12m	100	3,300	0	0.6	0.2		Springfield		
40t	WARE-AM	Persons 12+	M-Su 6a-12m	100	4,700	0	0.9	0.2		Springfield		
40t	WBZ-AM	Persons 12+	M-Su 6a-12m	100	3,000	0	0.5	0.2		Boston		
40t	WHAI-FM	Persons 12+	M-Su 6a-12m	100	6,000	0	1.1	0.2				
40t	WHLL-AM	Persons 12+	M-Su 6a-12m	100	3,900	0	0.7	0.2		Springfield		
40t	WJMN-FM	Persons 12+	M-Su 6a-12m	100	4,000	0	0.7	0.2		Boston		
40t	WNPR-FM	Persons 12+	M-Su 6a-12m	100	1,400	0	0.3	0.2		Hartford		
40t	WSRS-FM	Persons 12+	M-Su 6a-12m	100	5,300	0	1	0.2		Worcester		
40t	WXOJ-FM	Persons 12+	M-Su 6a-12m	100	2,800	0	0.5	0.2		Springfield		
	Analysis Total	Persons 12+	M-Su 6a-12m					81.9				
Additional Notices:												
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21t	WHWY-FM	Persons 12+	M-Su 6a-12m	500	19,600	0.1	4.7	1		Fort Walton Beach		
21t	WNRP-AM	Persons 12+	M-Su 6a-12m	500	11,400	0.1	2.7	1		Pensacola		
21t	WRNE-AM	Persons 12+	M-Su 6a-12m	500	8,000	0.1	1.9	1		Pensacola		
21t	WTGF-FM	Persons 12+	M-Su 6a-12m	500	6,500	0.1	1.6	1		Pensacola		
25t	WBSR-AM	Persons 12+	M-Su 6a-12m	300	8,000	0.1	1.9	0.6		Pensacola		
25t	WEBY-AM	Persons 12+	M-Su 6a-12m	300	8,300	0.1	2	0.6		Pensacola		
25t	WHIL-FM	Persons 12+	M-Su 6a-12m	300	8,800	0.1	2.1	0.6		Mobile		
25t	WPCS-FM	Persons 12+	M-Su 6a-12m	300	9,300	0.1	2.2	0.6		Pensacola		
29t	WAAZ-FM	Persons 12+	M-Su 6a-12m	200	6,700	0	1.6	0.4		Fort Walton Beach		
29t	WBHY-FM	Persons 12+	M-Su 6a-12m	200	7,900	0	1.9	0.4		Mobile		
29t	WDWR-AM	Persons 12+	M-Su 6a-12m	200	3,300	0	0.8	0.4		Pensacola		
29t	WPFL-FM	Persons 12+	M-Su 6a-12m	200	4,800	0	1.1	0.4		Pensacola		
29t	WZLB-FM	Persons 12+	M-Su 6a-12m	200	5,600	0	1.3	0.4		Fort Walton Beach		
34t	WECQ-FM	Persons 12+	M-Su 6a-12m	100	5,400	0	1.3	0.2		Fort Walton Beach		
34t	WEGS-FM	Persons 12+	M-Su 6a-12m	100	4,500	0	1.1	0.2		Pensacola		
34t	WFXX-FM	Persons 12+	M-Su 6a-12m	100	3,700	0	0.9	0.2				
34t	WNCV-FM	Persons 12+	M-Su 6a-12m	100	7,200	0	1.7	0.2		Fort Walton Beach		
34t	WOWB-FM	Persons 12+	M-Su 6a-12m	100	2,500	0	0.6	0.2				
34t	WTKE-FM	Persons 12+	M-Su 6a-12m	100	6,500	0	1.6	0.2		Fort Walton Beach		
	Analysis Total	Persons 12+	M-Su 6a-12m					84.2				
Additional Notices:												
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Ranker Report Export from TAPSCAN Web												
Market:	MOBILE										Listening by Home Market (Avg Share)	
Survey:	Nielsen Radio Spring 2017											
Geography:	Metro											
Stations:	All Stations											
Age/Gender	Socioeconomic	Pop	Intab								Mobile	72.4
Persons 12+		531,500	1,548								Pensacola	12.6
											Biloxi-Gulfport-Pascagoula	3.7
											Fort Walton Beach	0.2
											Other	0.8
												89.7
	Station	Demo	Daypart	Average Persons	Weekly Cume Persons	Average Rating	Weekly Cume Rating	Average Share		Home Market		
1	WDLT-FM	Persons 12+	M-Su 6a-12m	9,400	85,000	1.8	16	14.2		Mobile		
2	WBLX-FM	Persons 12+	M-Su 6a-12m	6,900	103,200	1.3	19.4	10.4		Mobile		
3	WKSJ-FM	Persons 12+	M-Su 6a-12m	4,800	100,700	0.9	18.9	7.2		Mobile		
4	WMXC-FM	Persons 12+	M-Su 6a-12m	3,700	61,500	0.7	11.6	5.6		Mobile		
5	WRKH-FM	Persons 12+	M-Su 6a-12m	3,400	76,200	0.6	14.3	5.1		Mobile		
6	WABD-FM	Persons 12+	M-Su 6a-12m	3,300	103,600	0.6	19.5	5		Mobile		
7	WLVM-FM	Persons 12+	M-Su 6a-12m	2,900	50,000	0.5	9.4	4.4		Mobile		
8	WTKX-FM	Persons 12+	M-Su 6a-12m	2,700	49,000	0.5	9.2	4.1		Pensacola		
9	WMXC-FM HD2	Persons 12+	M-Su 6a-12m	1,800	39,400	0.3	7.4	2.7		Mobile		
10	WBHY-FM	Persons 12+	M-Su 6a-12m	1,700	35,400	0.3	6.7	2.6		Mobile		
11	WZEW-FM	Persons 12+	M-Su 6a-12m	1,600	38,200	0.3	7.2	2.4		Mobile		
12t	WGOK-AM	Persons 12+	M-Su 6a-12m	1,500	21,000	0.3	4	2.3		Mobile		
12t	WNTM-AM	Persons 12+	M-Su 6a-12m	1,500	20,000	0.3	3.8	2.3		Mobile		
14	WJTQ-FM	Persons 12+	M-Su 6a-12m	1,400	27,900	0.3	5.2	2.1		Pensacola		
15t	WAVH-FM	Persons 12+	M-Su 6a-12m	1,300	27,500	0.2	5.2	2		Mobile		
15t	WXBM-FM	Persons 12+	M-Su 6a-12m	1,300	38,900	0.2	7.3	2		Pensacola		
17	WHIL-FM	Persons 12+	M-Su 6a-12m	1,100	29,500	0.2	5.6	1.7		Mobile		
18t	WBUV-FM	Persons 12+	M-Su 6a-12m	900	15,200	0.2	2.9	1.4		Biloxi-Gulfport-Pascagoula		
18t	WYCT-FM	Persons 12+	M-Su 6a-12m	900	26,500	0.2	5	1.4		Pensacola		
20t	WNSP-FM	Persons 12+	M-Su 6a-12m	700	14,200	0.1	2.7	1.1		Mobile		

20t	WRGV-FM	Persons 12+	M-Su 6a-12m	700	25,300	0.1	4.8	1.1		Pensacola		
22	WMEZ-FM	Persons 12+	M-Su 6a-12m	600	21,300	0.1	4	0.9		Pensacola		
23	WPAS-FM	Persons 12+	M-Su 6a-12m	500	8,800	0.1	1.7	0.8		Biloxi-Gulfport-Pascagoula		
24t	WPCS-FM	Persons 12+	M-Su 6a-12m	400	10,300	0.1	1.9	0.6		Pensacola		
24t	WZNF-FM	Persons 12+	M-Su 6a-12m	400	16,400	0.1	3.1	0.6				
26t	WABF-AM	Persons 12+	M-Su 6a-12m	300	5,900	0.1	1.1	0.5		Mobile		
26t	WBHY-AM	Persons 12+	M-Su 6a-12m	300	10,300	0.1	1.9	0.5		Mobile		
26t	WKNN-FM	Persons 12+	M-Su 6a-12m	300	14,500	0.1	2.7	0.5		Biloxi-Gulfport-Pascagoula		
26t	WMAH-FM	Persons 12+	M-Su 6a-12m	300	8,600	0.1	1.6	0.5		Biloxi-Gulfport-Pascagoula		
26t	WMOB-AM	Persons 12+	M-Su 6a-12m	300	4,400	0.1	0.8	0.5		Mobile		
31t	WASG-AM	Persons 12+	M-Su 6a-12m	200	5,200	0	1	0.3		Mobile		
31t	WCSN-FM	Persons 12+	M-Su 6a-12m	200	7,900	0	1.5	0.3		Mobile		
31t	WMJY-FM	Persons 12+	M-Su 6a-12m	200	5,000	0	0.9	0.3		Biloxi-Gulfport-Pascagoula		
31t	WNGI-AM	Persons 12+	M-Su 6a-12m	200	3,800	0	0.7	0.3		Mobile		
35t	WCOA-AM	Persons 12+	M-Su 6a-12m	100	1,300	0	0.2	0.2		Pensacola		
35t	WERM-AM	Persons 12+	M-Su 6a-12m	100	5,200	0	1	0.2		Mobile		
35t	WHEP-AM	Persons 12+	M-Su 6a-12m	100	4,200	0	0.8	0.2		Mobile		
35t	WIJD-AM	Persons 12+	M-Su 6a-12m	100	3,800	0	0.7	0.2		Mobile		
35t	WKSM-FM	Persons 12+	M-Su 6a-12m	100	800	0	0.2	0.2		Fort Walton Beach		
35t	WRKH-FM HD2	Persons 12+	M-Su 6a-12m	100	5,500	0	1	0.2		Mobile		
35t	WUWF-FM	Persons 12+	M-Su 6a-12m	100	4,700	0	0.9	0.2		Pensacola		
35t	WXQW-AM	Persons 12+	M-Su 6a-12m	100	3,100	0	0.6	0.2		Mobile		
35t	WXRR-FM	Persons 12+	M-Su 6a-12m	100	2,400	0	0.5	0.2				
35t	WZKX-FM	Persons 12+	M-Su 6a-12m	100	4,500	0	0.8	0.2		Biloxi-Gulfport-Pascagoula		
								89.7				
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Ranker Report Export from TAPSCAN Web													
Market:	GREEN BAY										Listening by Home Market (Avg Share)		
Survey:	Nielsen Radio Spring 2017											Green Bay	46.6
Geography:	Metro											Appleton-Oshkosh	38.8
Stations:	All Stations											Milwaukee-Racine	0.4
												Other	3.4
Age/Gender	Socioeconomic	Pop	Intab									89.2	
Persons 12+		219,700	863										

19t	WOVM-FM	Persons 12+	M-Su 6a-12m	200	5,800	0.1	2.6	0.7		Appleton-Oshkosh		
19t	WOWN-FM	Persons 12+	M-Su 6a-12m	200	4,100	0.1	1.9	0.7		Green Bay		
19t	WPFF-FM	Persons 12+	M-Su 6a-12m	200	6,500	0.1	3	0.7				
19t	WPKR-FM	Persons 12+	M-Su 6a-12m	200	4,100	0.1	1.9	0.7		Appleton-Oshkosh		
19t	WRVM-FM	Persons 12+	M-Su 6a-12m	200	5,300	0.1	2.4	0.7				
19t	WVBO-FM	Persons 12+	M-Su 6a-12m	200	7,400	0.1	3.4	0.7		Appleton-Oshkosh		
27t	WAUN-FM	Persons 12+	M-Su 6a-12m	100	3,400	0	1.5	0.4		Green Bay		
27t	WBDK-FM	Persons 12+	M-Su 6a-12m	100	2,900	0	1.3	0.4				
27t	WDOR-FM	Persons 12+	M-Su 6a-12m	100	5,100	0	2.3	0.4				
27t	WDUZ-AM	Persons 12+	M-Su 6a-12m	100	3,000	0	1.4	0.4		Green Bay		
27t	WHBY-AM	Persons 12+	M-Su 6a-12m	100	3,200	0	1.5	0.4		Appleton-Oshkosh		
27t	WJOK-AM	Persons 12+	M-Su 6a-12m	100	2,200	0	1	0.4		Appleton-Oshkosh		
27t	WLST-FM	Persons 12+	M-Su 6a-12m	100	2,100	0	1	0.4				
27t	WPVM-FM	Persons 12+	M-Su 6a-12m	100	600	0	0.3	0.4				
27t	WSCO-AM	Persons 12+	M-Su 6a-12m	100	2,200	0	1	0.4		Appleton-Oshkosh		
27t	WSFQ-FM	Persons 12+	M-Su 6a-12m	100	1,500	0	0.7	0.4				
27t	WTMJ-AM	Persons 12+	M-Su 6a-12m	100	3,200	0	1.5	0.4		Milwaukee-Racine		
	Analysis Total	Persons 12+	M-Su 6a-12m					89.2				
Additional Notices:												
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[illegible]

21t	WKRU-FM	Persons 12+	M-Su 6a-12m	400	9,000	0.1	2.6	1		Green Bay		
21t	WNAM-AM	Persons 12+	M-Su 6a-12m	400	8,500	0.1	2.5	1		Appleton-Oshkosh		
21t	WOVM-FM	Persons 12+	M-Su 6a-12m	400	11,500	0.1	3.3	1		Appleton-Oshkosh		
24t	WOSH-AM	Persons 12+	M-Su 6a-12m	300	6,700	0.1	1.9	0.7		Appleton-Oshkosh		
24t	WPFF-FM	Persons 12+	M-Su 6a-12m	300	7,400	0.1	2.1	0.7				
24t	WSCO-AM	Persons 12+	M-Su 6a-12m	300	8,000	0.1	2.3	0.7		Appleton-Oshkosh		
27t	WDKV-FM	Persons 12+	M-Su 6a-12m	200	3,600	0.1	1	0.5				
27t	WDUX-FM	Persons 12+	M-Su 6a-12m	200	2,400	0.1	0.7	0.5				
27t	WFDL-FM	Persons 12+	M-Su 6a-12m	200	3,400	0.1	1	0.5				
27t	WKZG-FM	Persons 12+	M-Su 6a-12m	200	11,100	0.1	3.2	0.5		Appleton-Oshkosh		
27t	WORQ-FM	Persons 12+	M-Su 6a-12m	200	9,500	0.1	2.8	0.5		Green Bay		
27t	WTCX-FM	Persons 12+	M-Su 6a-12m	200	5,200	0.1	1.5	0.5				
27t	WTMJ-AM	Persons 12+	M-Su 6a-12m	200	8,000	0.1	2.3	0.5		Milwaukee-Racine		
34t	WAUH-FM	Persons 12+	M-Su 6a-12m	100	3,600	0	1	0.2				
34t	WBCV-FM	Persons 12+	M-Su 6a-12m	100	3,000	0	0.9	0.2		Wausau-Stevens Point		
34t	WEMY-FM	Persons 12+	M-Su 6a-12m	100	1,800	0	0.5	0.2		Green Bay		
34t	WHA-AM	Persons 12+	M-Su 6a-12m	100	1,600	0	0.5	0.2		Madison		
34t	WIFC-FM	Persons 12+	M-Su 6a-12m	100	3,700	0	1.1	0.2		Wausau-Stevens Point		
34t	WISN-AM	Persons 12+	M-Su 6a-12m	100	2,300	0	0.7	0.2		Milwaukee-Racine		
34t	WOLX-FM	Persons 12+	M-Su 6a-12m	100	3,500	0	1	0.2				
34t	WPCK-FM	Persons 12+	M-Su 6a-12m	100	3,700	0	1.1	0.2		Green Bay		
34t	WRST-FM	Persons 12+	M-Su 6a-12m	100	3,000	0	0.9	0.2		Appleton-Oshkosh		
34t	WVCY-AM	Persons 12+	M-Su 6a-12m	100	400	0	0.1	0.2		Appleton-Oshkosh		
34t	WWSP-FM	Persons 12+	M-Su 6a-12m	100	300	0	0.1	0.2		Wausau-Stevens Point		
	Analysis Total	Persons 12+	M-Su 6a-12m					86.7				
Additional Notices:												
Estimates reported for dayparts which start and end between 12m and 5a are based on the 5a-5a broadcast day. Estimates for all other dayparts are based on the 12m-12m calendar day.												

Please note: The intab reported is for the full twelve weeks of the survey. Users should note that reports run on fewer than twelve weeks are based on smaller sample sizes.												
Stations qualify to be reported if they have received credit for five or more minutes of listening in at least 10 in-tab diaries in the survey area, Monday-Sunday Midnight-Midnight, during the survey period.												
Estimates are derived from the diaries that provided the audience data for the Nielsen Radio Market Report and are subject to the qualifications and limitations stated in that Report. The TAPSCAN Web software product is accredited by the Media Rating Council and reports both accredited and non-accredited data. For a list of the accredited and non-accredited Nielsen radio markets and data available through TAPSCAN, click here: http://www.arbitron.com/downloads/MRC_Accredited_Services_Markets.pdf												
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A Nielsen Radio eBook Special Notices and Station Activities document has been generated for each survey. Please select the hyperlink to the survey that interests you.												
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